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AUTHOR Rochte, Newton C.
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ABSTRACT

Unlike traditional postsecondary education, continuing professional education (CPE) does not have a long-established system of legally recognized program providers coupled with a quality control mechanism of institutional and specialized accrediting bodies. Accrediting bodies are just beginning to insist on CPE quality standards comparable to their standards for credit-granting institutions. Inadequate service in the disorderly marketplace of CPE programs by reputable and legally recognized accreditation bodies and the reluctance of the Council on Postsecondary Institutions to legitimize continuing education programs make it imperative for action to be taken in improving the current CPE system of accreditation. A research for action project has been proposed to improve postsecondary education accreditation in general and CPE in particular. One intended outcome of the project is to develop a model of excellence for accreditation of CPE programs for practitioners in professional fields, including those for whom state licensure is required. A literature review helped determine purposes and outcomes of CPE accreditation. Prospective users have been identified. A proposed CPE accreditation model has been developed. (Each chapter concludes with a list of references. Chapter V presents the CPE Accreditation Model: Essential Characteristics. Appendixes include a 266-item bibliography, list of potential advisory group members, article on the Delphi as a research tool, schedule of activities, and project glossary.) (YLB)

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ACCREDITATION OF CONTINUING PROFESSIONAL EDUCATION: A PROJECT

for

Improving Continuing Professional Education Accreditation Through Greater Involvement of National Associations, Accrediting Bodies, and Certifying Organizations

by

Newton C. Rochte

December 29, 1992

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FOREWORD

The writer has been concerned with the problems and potential of accreditation for over a quarter of a century. During his 18-year tenure as dean of a community and technical college, he served on many accreditation examining teams for the North Central Association of Colleges and Schools. After leaving the two-year college, he taught graduate courses in a college of education, including one entitled Continuing Professional Education. During his teaching career he served on accreditation examining teams for the National Accrediting Commission of Cosmetology Arts and Sciences and for the Accrediting Council for Continuing Education and Training (ACCET).

Shortly before leaving his position as president of ACCET, Dr. Larry K. Dodds encouraged the writer to undertake a research project that led to the preparation of this monograph. This monograph represents not the culmination of a research project but a continuim of a deep-seated belief in the potential of accreditation to be one of the best means for improving postsecondary education and continuing professional education in the United States.

This monograph can be considered as a foundation for further research leading to improving the current system of postsecondary education accreditation in general and continuing professional education in particular. In brief, the monograph is a proposal for a project on improving the credentialing combination of continuing professional education accreditation, certification, and licensure. For reasons noted in the monograph, the proposal concentrates on the process of accreditation.

Chapter I

OVERVIEW AND PERSPECTIVES

Project Overview

American car manufacturers are not alone with the problem of quality control. Postsecondary education, including continuing professional education, has been beset with increasing pressures to train and retrain an aging American workforce that can better adapt to the rapidly changing technology at home and abroad. Those pressures range from eliminating illiteracy among the unskilled to more efficient managerial skills in both service and manufacturing industries and continuing improvement in performance among the professionals. Although managers and professionals represent a minority in the workforce, they constitute a critical mass if the United States is to be successful in confronting foreign competition and to provide the needed leadership among the emerging nations of the world.

Continuing professional education is the keystone in the archway between past training plus work experience and the rapidly growing complexities of current and future societal demands for increasing managerial and professional competence. Unlike traditional postsecondary education with its long-established system of degree-granting institutions, continuing professional education relies upon a chaotic grab-bag of self-serving entrepreneurs, trade and professional associations, proprietary schools, and occasional noncredit offerings by colleges and universities.

Whereas quality control among car manufacturers is exerted by national and international competition, a limited quality control in continuing professional education is provided by regional and national accrediting bodies that come within the purview of the federal government. Licensing agencies of state governments -- for professional societies and proprietary schools -- also are involved. The informal system of balancing quality control responsibilities among accrediting bodies, federal government, and state agencies has come to be known as the triad. That triad is becoming unbalanced and quality assurance for continuing professional education is being threatened.

Not only is the interplay among those three quality control forces, especially between accrediting bodies and the federal government, in jeopardy, but the accrediting system is suffering from internal dissension and has failed to accommodate the special needs of continuing professional education. The major thrust of this monograph is to try to strengthen the accreditation system in general and the continuing professional education accreditation system in particular.

Continuing professional education (CPE) is the new kid on the academic block. That new education kid is an offspring of adult education and postsecondary education. Consequently, its genetic makeup includes characteristics of both. Its lineage has contributed to the difficulties that CPE accreditation has experienced in becoming accepted by the postsecondary education family on the credentialing block. That lineage also has made it difficult for state and federal regulatory bodies, trade and professional associations, and certification organizations to perceive the proper role and relationship of CPE accreditation to their areas of responsibilities.

The time has come to enhance the acceptability of CPE accreditation. The thrust of this monograph is the presentation of a methodology for improving the current system of CPE accreditation. The bedrock of that methodology is based on the premise that fundamental changes for improving the CPE accreditation system can occur only with the active involvement of representatives from: (1)institutional and specialized (programmatic) accrediting bodies, (2)certification organizations, (3)trade and professional associations, and (4)state and federal regulatory agencies.

Implementation of the methodology will culminate in two major outcomes. One outcome is to be the establishment of collaborative relationships among the practitioner community (trade and professional associations), the licensure community (state regulatory agencies), the program-approval community (regional and specialized accrediting bodies), and the certification community (certifying organizations). An underlying premise of this project is that CPE accreditation cannot be improved in isolation from invested interest groups within and outside the CPE accreditation system.

Establishment of the collaborative relationships will make possible the attainment of the second major outcome: the development of a model of excellence in CPE accreditation. It will be developed with the involvement and expertise of leaders in national trade and professional associations, regional and national accrediting bodies, and national certifying organizations. As will be explained later, licensure agencies will be consulted but not actively involved in the model construction.

A Historical Perspective: Credentialing

In an early article entitle "The Relationship Among Accreditation, Certification, and Licensure," Shimberg (Shimberg 1983) concisely sketched the historical evolution of the credentialing system with its processes of accrediting, certifying, and licensing. Prominent in that sketch were the increasing dominance of the professional associations in shaping the credentialing system and the

growing tendency of those associations and governmental agencies to use the credentialing processes for purposes other than those for which they were originally designed. He concluded his observations with the following questions and recommendation:

> Which of the purposes of licensing, certification and accreditation can legitimately be fulfilled with existing mechanisms: How can those mechanisms be redesigned to better serve their intended purposes?.....the professions should be looking for ways to devise new institutions that will remove barriers to the full use of human resources.....(Shimberg 1983, p. 114).

Shimberg's concerns have been echoed by others (Alford 1980; Asp 1985' Houle 1980; Nowlen 1988; Stern 1983; Young 1983). Whereas Shimberg, early on, was primarily concerned with the entrance of newly inducted practitioners into their chosen fields, the other writers were concentrating on the emerging emphasis on continuing professional education. In a more recent article, "Assuring the Continued Competence of Health Professionals, (Shimberg 1987) Shimberg demonstrated that he, too, had become concerned about the appropriate relationship among professional associations, the current mechanisms for reaccreditation, recertification, and relicensure, and mandatory or voluntary continuing professional education. Nowlen captured the essence of that concern (Nowlen 1988, p. 8) when he wrote:

> Some professional groups mandated continuing education and then accredited programs they, themselves, offered and for which they charged fees, a practice worthy of the Chicago City Council.

Nowlen may have revealed his background in continuing higher education in his criticism. What cannot be ignored, however, is the fact that professional associations have been highly influential in shaping the existing credentialing system in that they often exercise final responsibility for educational programming and certification of practitioners in the associations' professional fields, and that in accreditation they require certified or licensed practitioners to be graduates of accredited institutions.

In the United States, the responsibility for most accreditation and reaccreditation has been assumed by regional and specialized accrediting bodies, with the blessing of the federal government. The regional associations consist of institutional memberships (Middle States Association of Colleges and Schools, New England Association of Schools and Colleges, North Central Association of Colleges and Schools, Northwest Association of

Schools and Colleges, Southern Association of Colleges and Schools, and Western Association of Colleges and Schools). Consequently, the accreditation process is institutional in scope. The U.S. Secretary of Education, in the Listing of Nationally Recognized Accrediting Agencies and Associations, defines institutional and specialized accreditation as follows:

> Institutional accreditation normally applies to an entire institution, indicating that each of its parts is contributing to the achievement of an institution's objectives, although not necessarily all on the same level of quality..... Specialized accreditation normally applies to evaluation of programs, departments or schools which usually are parts of a total collegiate or other postsecondary institution.....In addition, a number of specialized accrediting agencies accredit educational programs within non-educational settings, such as hospitals. (U.S. Department of Education 1989, p.3)

Glidden, in Understanding Accreditation (Young 1983, pp. 190, 192) wrote:

> Specialized accreditation is also called programmatic accreditation and professional accreditation.....Most specialized accrediting bodies, however, are arms of associations or councils formed by several individual-membership groups representing a profession.

The U.S. Department of Education Listing of Nationally Recognized Accrediting Agencies and Associations includes only those institutional and specialized accrediting bodies that have met the department's criteria for approval. That approval is important, in fact critical, to many member institutions within the accrediting bodies. Unless an institution's accrediting agency is on that approval list, it is not eligible for federal funding, especially for the enrollees in its educational programs. Chambers (Young 1983, p. 268) points out that the "blessing" of the federal government comes at a price:

> As long as accreditation is linked to determining institutional eligibility for federal funding programs, there will be an interest within both the government and accrediting bodies to have the relationship serve each other's special interests. Accrediting bodies can probably never return to an era when their sole mission was to assess educational quality. Like it or not, they have become a central source of

information about postsecondary education that the federal government relies on.

To date, it appears that very few of the CPE providers -- especially the professional associations -- have wanted an open door to federal funding. There is a question, however, as to whether more trade and professional associations would offer CPE programs if their individual members were eligible for such funding. Not all of the trade and professional associations have sufficient resources -- either in terms of membership or money -- to develop and provide CPE programs to their members. In recent years, an increasing number of associations have established a system of CPE approval whereby they select and monitor CPE programs offered by other agencies. Some of those agencies are institutions whose primary purpose is to provide educational programs; others are institutions whose primary purpose is something other than education. There is a question as to whether trade and professional associations with association-approved CPE program would benefit from accreditation of those programs and whether their CPE providers also would benefit from accreditation even when neither the associations nor their CPE providers may be concerned about the availability of federal funding.

To sum up, currently the federal government influences the working relationship between trade and professional associations and accrediting agencies primarily in pre-professional education programs. However, questions have been brought up as to whether in the near future the federal government will have similar influence on CPE programming especially if an increasing number of CPE providers desire federal funds for their enrollees.

Similar questions can be asked in respect to state governments. The 50 states now license practitioners in approximately 800 occupational and professional fields (U.S. Department of Labor, 1969). A minimum requirement for obtaining a license in all of the professional fields and many of the occupational areas is a baccalaureate or higher degree from an accredited institution. Increasingly, the 50 states are requiring the practitioners in many of those 800 occupational/professional fields to renew their licenses at regular intervals such as every three years. Since the early 1980s, there has been an increase in the number of states that require their licensees to enroll in CPE programs (often called mandatory CPE programs) in order to retain their licenses (the process of relicensure). Whereas the states explicitly require graduation from an accredited degree-granting institution for the original license in the professional fields, they tend to remain completely silent in respect to academic degree requirements for relicensure.

Most of the trade and professional associations that require their members to become recertified via mandatory CPE programs also either are silent about degree study or explicitly prohibit their members from enrolling in either undergraduate or graduate degree programs for the purpose of renewing their certificates. One consequence of that silence about or prohibition for degree study and the mandatory CPE requirements has been the proliferation of CPE providers. Milton R. Stern, longtime adult continuing education administrator, has described the proliferation as a "disorderly marketplace (Stern 1983, p. 5).

Cyril O. Houle, a longtime adult education researcher, writer, and educator, has constructed a classification system of CPE providers in an effort to bring some order to the disorderly marketplace. The following items were adapted from his list that appears in his book, Continuing Learning in the Professions (Houle 1980, Chapter 6):

* Professional associations

* Professional schools

* Nonprofessional sectors of colleges and universities offering continuing education programs

* Places of employment (employer-sponsored instruction)

* Independent providers of CPE (entrepreneurs)

* Purveyors of professional supplies and equipment

Given the disorderly marketplace of unlimited (and uncounted) number of CPE providers, perhaps the time has come to try to bring some semblence of order to that marketplace for the benefit of both the licensed professions and occupations and their practitioners. Perhaps, also, one way to establish a sense of order in the marketplace is to improve the credentialing system with its component "mechanisms" of accreditation, certification, and licensure.

Continuing professional education, unlike continuing adult education, has a short history. Its brief existence has been preoccupied by a multitude of CPE providers who have created what has been described as a disorderly marketplace. The credentialing system of accreditation, certification, and licensure now in place has not been able to instill a sense of order in that marketplace. It has been documented by Shimberg and others that a major contributor to the inadequacy of the present credentialing system is the dominance of trade and professional associations and some governmental agencies to use the three credentialing processes for purposes other than those for which they were originally designed. Another contributing factor is that one

major characteristics of CPE is that it is based primarily, some would say exclusively, on nondegree study.

In view of the situation just described, it would seem that Shimberg is correct in calling for a redesigning of the current credentialing system and possibly the creation of new credentialing institutions. Because of the nondegree characteristic of CPE, it may well be that there needs to be a new credentialing system that includes an emphasis on recertification, relicensure, and reaccreditation. The CPE system could be either a modification (redesigning) of the current credentialing system or the creation of a new system. It should be possible to minimize the potential for dominance by trade and professional associations and the misuse of the redesigned or new credentialing system by the associations and governmental agencies. This could be done by involving them in the redesigning of the current system or the development of a new CPE system.

If trade and professional associations and governmental agencies are to be involved in improving the CPE credentialing system or in developing a new one, that involvement may best be obtained through the accreditation process rather than with either certification or licensure.

A Historical Perspective: Accreditation Purposes

William K. Selden, former Executive Director of the National Commission on Accrediting (now known as the Council on Postsecondary Accreditation or COPA), and Harry V. Porter, former Executive Secretary of the Commission on Higher Education of the Middle States Association of Colleges and Schools, pooled their extensive accreditation experiences in a COPA publication entitled Accreditation: Its Purposes and Uses. After presenting an abbreviated history of postsecondary accreditation in the United States, they offered the following four as the initial and early purposes of postsecondary accreditation (Selden and Porter 1977, p. 3):

1. establishment of minimum education standards; and

2. insistence on the maintenance of minimum standards for protection of the public, the institutions, and their graduates.

3. stimulation for continued self-improvement by the institutions and programs.

4. protection of institutions from improper external or internal pressures.

Selden and Porter then extrapolated the above purposes into a list of twelve purposes under the rubric of: (1)Internal Uses of Accreditation, (2)External Uses of

Accreditation, (3)Professional Uses of Accreditation, and (4)Societal Uses of Accreditation (pp.5-15). Their expanded delineation of purposes revealed the increasing complexity of postsecondary accreditation that requires ".....evaluating many unfamiliar patterns of education." They added, however, "The traditional means of evaluating are not irrelevant; but they need substantial supplementation if accreditation is to continue to meets its obligation" (p. 18). They defined that obligation in this manner: "By the nature of their origins, structure, processes, and support accrediting agencies are well suited to carry out functions bearing particularly upon the identification, improvement, and preservation of educational quality" (p. 19).

Selden and Porter pointed out that the fulfillment of that obligation has become more difficult in recent years by the proliferation of "non-validated" institutions and programs some of which appear to be ".....products of simple entrepreneur ingenuity" (p. 18). They added an encouraging note by pointing out that accrediting agencies could exert some control over the non-validated institutions and programs whenever those institutions and programs applied for accreditation membership.

Whether they be called --non-validated--noncredit--non-degree--nontraditional-- or special programs, CPE programs offered by collegiate institutions are obligated to comply with the same or at least comparable accreditation standards as their --validated--credit--degree--traditional-- or conventional offerings. A recent examination of manuals and handbooks on policies, standards, and procedures published by all five of the national institutional accrediting bodies and 8 of the 9 regional institutional accrediting bodies recognized by the Council on Postsecondary Accreditation (COPA) revealed a consensus on that obligation. The following statement from the Middle States Association Commission on Higher Education publication, Characteristics of Excellence: Standards for Accreditation, is a typical example:

> Educational programs conducted off campus, or special programs offered on campus, must meet standards comparable to those of all other institutional offerings. Interaction with business, industry, or governments may provide opportunities for public service and enhance the environment for teaching, research, and service. However, contractual relations with profit-seeking firms or other institutions require diligent care to protect an institution's integrity and avoid abuse of its accredited status. (1989, p. 17)

It is the absence of concern or need for offering

academic credit that makes the delineation of the role of CPE accreditation a more difficult one. While the purposes and processes of CPE accreditation can be the same as or at least comparable to those for institutions and programs offering academic credit, it is the noncredit characteristic of CPE that requires Selden and Porter's "substantial supplementation" if existing and future accrediting agencies are to provide adequate policies and procedures for CPE accreditation.

Continuing professional education not only tends to consist primarily, almost exclusively, of noncredit study, but it also is nontraditional in nature. Whereas noncredit study pertains only to subject matter, nontraditional education has three aspects. It can consist of: (1) nontraditional subject matter, (2) nontraditional delivery systems (distance education programs, for example), and (3) nontraditional (usually older) students.

Traditional students, often thought of as students between the ages of 18 to 21 who are enrolled for full-time study, may also enroll in noncredit as well as credit courses and programs. Traditional college-age students may fulfill their degree requirements through non-traditional off-campus study including correspondence courses. Traditional students can become nontraditional by simply becoming older and/or enrolling for part-time study.

CPE students usually are older than the traditional college-age population. CPE subject matter tends to emphasize immediate application of new knowledge and skills to the practitioner's everyday professional practice. It is only through the occasional reliance on conventional teaching methods such as lectures that CPE programs are similar to traditional postsecondary education programs. Even here, the emphasis on practical application often discourages the use of the lecture and other traditional teaching methods.

If CPE programs are nontraditional, then the question arises as to whether such programs can be adequately evaluated by the existing system of institutional and specialized accreditation. One person who has devoted much time and effort in studying that question is Grover J. Andrews who currently is Associate Director for Instructional Services, Georgia Center for Continuing Education, The University of Georgia, and recently was elected president of the International Association for Continuing Education and Training.

Andrews reported his initial investigation of nontraditional education in his doctoral dissertation (Andrews 1972). Results of that study were instrumental in developing a new standard "....for evaluation and accreditation of adult and continuing education and other

nontraditional study programs" for the Southern Association of Colleges and Schools (Andrews 1972, p. 42).

Later, as associate executive secretary, Commission on Colleges, Southern Association of Colleges and Schools, Andrews was appointed director of a national research project ".....to develop evaluative criteria for nontraditional education....." from an accreditation perspective (Andrews 1978, p. 3). The research project was sponsored jointly by the Council on Postsecondary Accreditation and its regional accrediting associations. Funding was provided by the Kellogg Foundation. The project task force prepared a four-volume Report ending with a Summary of the Project Report.

The Summary included twenty-five General Recommendations addressed to the "specific audiences" of: (1) Postsecondary Education in the United States, (2) Traditional and Nontraditional Educators, (3) Accrediting Associations, and (4) The Council on Postsecondary Accreditation (COPA). It culminated with a "Policy Statement on the Accreditation of Nontraditional Education" with the advocation of COPA to assume the primary responsibility for implementing the recommended policies. (Andrews 1978, pp. 22-37)

More recently, Andrews reviewed the status of nontraditional education accreditation and reported that, while COPA had not assumed responsibility for implementing the recommended policies, several regional and specialized accrediting associations had incorporated nontraditional education in their standards and operating procedures. However, he repeated the task force's recommendation for COPA to assume that responsibility (Andrews 1983, p. 357).

The task force, in its report, included what could be construed as a reassuring observation to traditional collegiate institutions and programs when it wrote: "Nontraditional education is basically a variation within, not a departure from, the traditional purposes, processes, and outcomes of American postsecondary education (p. 347)." Presumably, then, accreditation of nontraditional education also is basically a variation within, not a departure from, the purposes, processes, and outcomes of traditional American postsecondary education accreditation.

Mention has been made of the fact that continuing professional education, like adult education, tends to consist of noncredit study. There is one characteristic of continuing professional that distinguishes it from adult education. Whereas most adult education is voluntary in nature, most continuing professional education programs are mandatory either by the trade and professional associations or by state regulatory agencies for the purpose of relicensure.

A Historical Perspective: Accreditation Outcomes

Traditionalists in postsecondary education and in postsecondary accreditation may agree with the task force and Andrews that nontraditional education and nontraditional accreditation are variations within and not departures from traditional education and accreditation purposes and processes. Where they may beg to differ is the emphasis that the task force and Andrews have placed on outcomes. Andrews has stated his and the task force's position in this manner:

> .....the goal of an outcomes-oriented accreditation process should be that an institution will develop, implement, and evaluate its effectiveness on a regular basis. In so doing, an institution should be expected to--
>
> 1. Translate its mission and needs assessment data into specific goals, objectives, and measurable (emphasis added) educational outcomes.
>
> 2. Provide for a systematic procedure for measuring (emphasis added) the effectiveness of its methods for achieving its goals and desired outcomes.
>
> 3. Provide for a systematic and regular means of collecting, organizing, and analyzing outcome data.
>
> 4. Have effective procedures for using the data collected for decision making, policy setting, planning, and resource allocation for institutional improvement.
>
> 5. Be able to demonstrate to others its effectiveness in achieving its educational outcomes. (Nowlen 1983, p. 356)

The emphasis on measurable outcomes propounded by the task force on nontraditional education was echoed by the CCEU Project to Develop Standards and Criteria for Good Practice in Continuing Education, a project sponsored by the Council on the Continuing Education Unit (recently changed to International Association for Education and Training) and the National University Continuing Education Association. Andrews served as the Principal Investigator for the project that culminated in a printed report entitled The Principles of Good Practice in Continuing Education. (Council on the Continuing Education Unit 1984)

Part Two of that report, "Learning Outcomes in Continuing Education," includes operational principles that traditionalists in postsecondary education and postsecondary accreditation probably consider to be acceptable for both credit and noncredit programs. Most of the Outcomes principles are "variations" to accommodate differences

between credit and noncredit study. For example, one principle includes the following "amplifications":

> 2.2.1 The learning outcome can be utilized and applied by learners in settings other than the learning environment (e.g., job, office, profession) after completion of the program/activity.
>
> 2.2.4 Where appropriate, a follow-up evaluation is made of former participants in a continuing education program/activity to determine if and how well the knowledge, skills, or attitude learned are utilized in work performance. (Council on the Continuing Education Unit 1984, p. 11)

While the above Outcome principle and its applications may be acceptable to some traditionalists, they may consider the following amplifications to be "departures from" rather than "variations within" another principle: "The continuing education provider has clear and concise, written statements of intended learning outcomes for the continuing education program/activity."

> 2.1.2 The statements of intended learning outcomes are assessable.
>
> 2.1.3 The number of statements of intended learning outcomes is limited to those that can be expressed or demonstrated by learners through some form of assessment. (Council on the Continuing Education Unit 1984, p. 10)

Although COPA may not have moved as quickly as some would have wished in implementing the task force's recommendations, particularly in respect to measurable outcomes, several of its regional and specialized accrediting bodies have undertaken serious efforts to do so (Andrews 1983, pp. 352-353). The recent review of publications of national and regional accrediting bodies, mentioned earlier, indicates that the national and regional accrediting bodies are continuing to upgrade their CPE accreditation standards and procedures. That upgrading may be related to two developments that should be of interest to those who are involved with continuing professional education accreditation.

One is that COPA and its constituent members have been assuming increasing responsibility for developing accreditation policies and procedures for an expanding array of postsecondary education services such as off-campus programs including overseas locations and military bases and

distance education programs via television and allied technology. These nontraditional activities have relevance for CPE accreditation since CPE, with its emphasis on noncredit study, is nontraditional.

The second development is more complex. On one hand, there is the element of connecting the outcomes of an educational program to performance on the (professional) job. On the other hand, there is the problem of adequate quality control of noncredit study. As has been mentioned before, practically all of the existing CPE programs are based upon noncredit study.

Although most CPE programs are noncredit, it may be that the emerging accreditation policies and procedures for such nontraditional services as off-campus credit study and distance (credit) education have implications for CPE accreditation. It is possible that those implications may become more evident as the Council on Postsecondary Accreditation continues with its recently adopted research project on outcomes assessment that was described in COPA's Fall 1990 Quarterly Newsletter as follows:

> "Accreditation for Educational Effectiveness: Assessment Tools Improvement" is a Council on Postsecondary Accreditation project funded by the Fund for the Improvement of Postsecondary Education (FIPSE) of the U.S. Department of Education. The two year project will focus on the role of outcomes assessment in the accreditation process and in the recognition of accrediting bodies. (Council on Postsecondary Accreditation, p. 1)

As of this writing, two publications have emerged from the COPA project. They are:

1991. Outcomes Assessment and Analysis: A Reference Document for Accrediting Bodies.

1992. Accreditation, Assessment and Institutional Effectiveness: Resource Papers for the COPA Task Force on Institutional Effectiveness.

Although neither publication is concerned directly with continuing professional education, the 1991 resource document concludes its Introduction with these words:

> "The questionnaire results and bibliography should clearly dispel any lingering doubts on the part of the publics of accreditation that accrediting bodies are not taking assessment and outcomes utilization seriously." (p. 6)

The more that COPA, like an increasing number of its regional accrediting bodies, endorses the concept of outcomes, the more it will strengthen the role of continuing professional education accreditation.

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Chapter II

THE NEED FOR A CPE ACCREDITATION RESEARCH FOR ACTION PROJECT NOW

The preceding chapter presented an overview of the increasing complexities of providing quality control in continuing professional education. There, it was pointed out that, unlike traditional postsecondary education, continuing professional education does not have a long-established system of legally recognized program providers (colleges and universities) coupled with a quality control mechanism of institutional and specialized accrediting bodies. Houle's classification system of CPE providers merely hints at the number of organizations and individuals that purport to offer professional-quality CPE programs.

Here, again, is his list:

* Professional associations
* Professional schools
* Nonprofessional sectors of colleges and universities offering continuing education programs
* Places of employment (employer-sponsored instruction)
* Independent providers of CPE (entrepreneurs)
* Purveyors of professional supplies and equipment

The existing system of regional and specialized accrediting bodies approved by the Council on Postsecondary Accreditation encompasses only two on Houle's list. They are:

* Professional schools
* Nonprofessional sectors of colleges and universities offering continuing education programs

As was mentioned in Chapter I, even in the instance of those two types of CPE providers the accrediting bodies are just now beginning to insist on CPE quality standards comparable to those of their standards for credit-granting institutions. What should be noted is that the CPE-offerings of the professional schools and nonprofessional sectors of colleges and universities constitute a small portion of the total number of programs in the "disorderly CPE marketplace."

A perspective on the size of the disorderly marketplace can be obtained from the following information gleaned from a

computer search of the Encyclopedia of Associations using the two descriptors of Education and Training:

899 Education Programs
514 Training Programs
1,413 Total (in Volumes 1 and 3 on 22,574 national associations only; state and regional associations in other volumes not included)

There is no information readily available on the numbers of education/training programs offered by employer-sponsored operations, entrepreneurs, and purveyors of professional supplies and equipment. What is clear is that the disorderly marketplace of CPE programs is being inadequately serviced by reputable and legally-recognized accreditation bodies. This fact, coupled with the reluctance of the Council on Post-secondary Accreditation to legitimize continuing education programs, makes it imperative for action to be taken now in improving the current CPE system of accreditation.

Internal and External Pressures

As mentioned in Chapter I, Selden and Porter -- in their book, Accreditation: Its Purposes and Uses -- stated that one of the four basic purposes of accreditation is to provide ".....protection of institutions from improper external or internal pressures." (Selden and Porter, 1977, p. 3) Recent events indicate that accreditation bodies, too, need protection from such pressures.

Continuing professional education accreditation, as an integral part of the postsecondary education accreditation system, is being subjected to pressures from both the U.S. Congress and the U.S. Department of Education to make significant changes in policies and procedures. While the pressures may result in improving the accreditation system in the short run, there remains the distinct possibility that the increased governmental intervention may subsequently lead to the demise of the entire nongovernmental postsecondary accreditation movement.

During the past two years, Congress has been pressuring the U.S. Department of Education (USDOE) to reduce the default rate on student loans by strengthening its accreditation and re-accreditation procedures, including those in continuing professional education, that would improve: (1) student retention and graduation rates, (2) job employability, and (3) successful employment experience. The following headlines in recent issues of The Chronicle of Higher Education highlight the Congressional pressures and USDOE's responses:

"Education Dept. to Revise Its Rules for Recognizing Accrediting Agencies." (Jaschik 17 April 1991 p. 22)

"Education Secretary Wants to End the Role of Accrediting in Student-Aid Eligibility: Critics say plans would weaken system of voluntary evaluation" (Jaschik 27 November 1991 p. 1)

Currently, USDOE relies heavily upon its approved accreditation bodies for the prosecution of its credentialing responsibilities. The present loan default situation tarnishes both USDOE and legitimate credentialing institutions through the well-known process of guilt by association. As revealed above, USDOE proposes to obtain Congressional absolution through dissolving its working partnership with accrediting bodies. The following Chronicle excerpt shows that some Congressional members favor such a divorce:

"Proposals in Congress to Tighten Student-Aid Rules" -- House Bill: Breaks the link between accreditation and aid eligibility and provides federal funds to state agencies to improve oversight of institutions." (DeLoughry 18 December 1991, p. 28)

The loan defaults threat is being accompanied by another USDOE activity -- a delay in renewing recognition of the Middle States regional accrediting body -- as highlighted in the following Chronicle headlines:

"Renewal of Recognition of an Accrediting Group Delayed by U.S. Over Campus-Diversity Policy" (Jaschik 17 April 1991 p. 22)

"Middle States Moves to Compromise on Diversity Rules: Trustees say standards are not a condition of accreditation" (Jaschik 18 December 1991 p. 25)

"Middle States' Decision on Diversity Standards Seen Enhancing Federal Role in Accreditation" (Jaschik 8 January 1992 p. 24)

As can be seen from the above quotations, it is through the use of USDOE's eligibility requirements for funding that the federal government has been exerting pressures on accrediting bodies on the problem of defaults on student loans. In addition, USDOE by itself has used those requirements in delaying continued recognition of a regional accrediting body because ".....it allows its reviewers to evaluate the diversity of a college's faculty and student body." (Jaschik 17 April 1991 p. 22) The seriousness of USDOE's actions can be seen in a Chronicle article entitled "The Dangers of U.S. Intervention in Accreditation" that was written by Robert H. Atwell, President of the American Council on Education.

> The ad hoc, case-based approach taken by Mr. Alexander [USDOE Secretary] poses several dangers. It may prejudice any future policy-making procedures. It may politicize the department's recognition process and render it arbitrary and unpredictable. It also risks enmeshing the Secretary in the internal politics of institutions and accrediting bodies. (20 November 1991 p. 52)

The above examples of external pressures help to portray the need for strengthening both postsecondary education accreditation and continuing professional education accreditation. There also is the need to be on guard against internal pressures as shown in the following Chronicle headlines:

> "Leaders of Regional Accrediting Agencies Voice Dissatisfaction with National Organization; Some Say Defections are Possible" (Leatherman 27 March 1991 p. 11)
>
> "Specialized Accrediting Agencies Challenged by Campus Officials" (Leatherman 18 September 1991 p. 1)

The internal pressures reflected in the above headlines are long-standing. They predate the emergence of the Council on Postsecondary Accreditation in 1975. At that time COPA resulted from the merger of the Federation of Regional Accrediting Commissions of Higher Education representing the six regional associations and the National Commission on Accrediting representing the extensive array of specialized accrediting bodies.

The above headlines highlight the uneasy truce between regional (institutional) and specialized (programmatic) accrediting bodies in COPA. The merger of the National Commission and the Federation is like a marriage heading either for a divorce or a separation. The marriage truce makes more difficult the attempts of CPE organizations (that basically are specialized in nature) to obtain more attention and more support by the COPA accreditation community.

CPE Polarization

The existing CPE accrediting system is not only hamstrung by the divisiveness within COPA, but it also is polarized. On one hand, some national trade and professional associations have conflicts of interest through their control both of CPE programs and the accreditation/certification services provided to their individual members. On the other hand, not all USDOE-approved accrediting bodies appear ready to extend their services to those associations' members.

This polarization has been identified outside the post-secondary education field as well. In her "State of the Workforce Address" delivered to the State Teachers and Principals of the Year in Washington, DC, on October 20, 1989, former U.S. Department of Labor (USDOL) Secretary, Elizabeth Dole, stated that she soon would appoint:

> .....a high-level national advisory board on workplace training with representation from industry, labor, education, and government to work with me in developing a voluntary system for accrediting workplace training programs. These programs will be based on standards developed jointly with industry. The Department of Labor will act as the ultimate accrediting agent with the ability to delegate this authority to appropriate business and professional organizations. (U.S. Department of Labor 1989)

If Shimberg, Nowlen, and other longtime CPE practitioners and educators are correct in their criticisms and suggestions for improvement of the existing accreditation system currently identified with the Department of Education, then it would seem that the Department of Labor would want its forthcoming "high-level national advisory board" to heed those criticisms and suggestions in order to avoid the alleged imperfections of the existing accreditation (and CPE accreditation) system. Thus, an additional use of an on-going accreditation research for action project could be to provide the Department of Labor with a timely tool with which to begin its workplace accreditation program as well as to demonstrate clearly that the accreditation (CPE accreditation) community is pro-active in its approach to the alleged imperfections including the loan default problem.

The Department of Education currently is conducting a comprehensive review of its publication, Nationally Recognized Accrediting Agencies and Associations: Criteria and Procedures for Listing by the U.S. Secretary of Education and Current List. The proposed new regulations emanating from that review are expected to be ready for implementation in 1993. The continuation of this CPE research for action project could be of assistance to USDOE before the implementation of the department's new regulations. Also, the project could help to protect the integrity of the accreditation (and CPE) system and strengthen the credentialing triad of the states' regulatory agencies, the accreditation bodies, and the federal government.

Now is the opportune time for action.

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Chapter III

RESEARCH AND OUTCOMES

Rationale

This monograph is concerned with laying the foundation for a research for action project to improve postsecondary education accreditation in general and continuing professional education in particular. The proposed project predicates two major outcomes. One will be the ongoing involvement of national organizations -- primarily through their chief executives -- in a collaborative effort to improve CPE accreditation among national trade and professional associations and accrediting bodies with the assistance of major certifying organizations and in consultation with representation from state regularatory bodies. That collaborative effort will be supported through inviting over sixty (60) additional national organizations with interests in, but not responsibilities for, accreditation to serve as an advisory group to the chief executives of the key national organizations. That key group will be known as the Panel of National Association Executives.

The second major outcome of the research for action project will be the development of a model of excellence for CPE accreditation to be developed by the Panel of National Association Executives and its 60-member advisory group. The model will be tested through two samples of national trade and professional associations, national and regional accrediting bodies, and national certifying organizations. One sample will be based upon questionnaire surveys; the other upon on-site in-depth interviews.

As Shimberg has pointed out, accreditation is one component of the postsecondary education credentialing system. Although only one model -- accreditation -- of excellence will be developed and tested, it is quite probable that the methodology for its development and testing and the model itself will have ramifications for the development of a model of excellence for certification at a later date.

Although licensure is another component of the credentialing system, the proposed project will not include licensure per se in its focus. Licensure is a two-part governmental responsibility. On one hand, it pertains to governmental approval of education institutions; on the other, to governmental authorization of practitioners to render specialized services to the general public. Accreditation and certification are non-governmental activities provided by national associations, accrediting bodies, and certifying organizations. However, given the obvious relationships among accreditation, certification, and licensure, national organizations concerned with licensure

and state regularatory agencies will be consulted throughout the duration of the project.

Design/Methodology

The first step in the project will be the creation of the Panel of National Association Executives. First preference will be chief executives of "umbrella" organizations among national trade and professional associations, national and regional accrediting bodies, and national certifying organizations. Examples are the American Society of Association Executives, Council on Postsecondary Accreditation, and National Association on Competency Assurance.

The first responsibility of the Panel will be the selection of the representative organizations to serve as an advisory group to the Panel. It then will work with the advisory group in: (1) developing a model of excellence in CPE accreditation; (2) developing questionnaires for testing the model and selecting the respondents for those questionnaires; (3) developing interview guides for on-site in-depth interviews and selecting the organizations and individuals to be interviewed; (4) selecting a team of three evaluators for the project; (5) critiquing the final report of the project; and (6) disseminating the results of the project through a national conference and intra-organizational meetings and publications.

Members of the advisory group will be chief executive officers (or their designates) of national organizations that have interests in and concerns about in the credentialing system of CPE accreditation and certification but do not have direct responsibilities for credentialing. Possible examples of organizations receiving invitations to the Panel's advisory group are the: (1) American Council on Education, (2) American Association for Adult and Continuing Education, (3) Association for Continuing Higher Education, and (4) National University Continuing Education Association. (See Exhibit A for a starter list of possible organizations and their chief executive officers.)

Multiple data-gathering and modified Delphi methods will be used in the two stages of data collecting. Stage one will concentrate on the use of mailed questionnaires to stratified random samples of national associations and societies; regional, national, and specialized accrediting bodies; and certifying organizations. Each questionnaire will have two parts. Part one will focus on determining the status of the credentialing components of accreditation and certification among those institutions that offer or require continuing professional education. Part two will elicit opinions on the adequacy of the current quality control system of accreditation and certification and opinions on the applicability of a proposed model of excellence in CPE

accreditation to their institutions' CPE activities.

Stage two will consist of case studies of selected representative national trade and professional associations and accrediting bodies. The case studies will be based upon in-depth on-site structured interviews and will begin upon completion of the questionnaire surveys in stage one. More emphasis, than in stage one, will be placed on the applicability of the model of excellence in CPE accreditation.

A modified Delphi method will be used extensively with the Panel as it becomes involved with selecting and working with its advisory group members, designing the questionnaires and selecting the respondents, constructing the structured interviews and selecting the interviewees, and interpreting the findings of the questionnaire and interview surveys. It also will be used with the advisory group members as they, too, become involved with the questionnaire and interview surveys. (See Exhibit B for a detailed explanation of the Delphi method and the rationale for using it in the project.)

It is anticipated that the establishment of collaborative relationships among the pertinent national organizations, coupled with the nationwide questionnaires and interview sampling, will expedite the development and utilization of a model of excellence for improving the existing accrediting mechanisms in continuing professional education. In addition to contributing to the development of a model of excellence, those collaborative relationships could be instrumental in enabling national trade and professional associations to strengthen their accreditation services to their member institutions. Equally important, those collaborative relationships could encourage USDOE/COPA-approved agencies to place continuing professional education in a more prominent position among their accreditation activities including extending their CPE services to the institutional members of the national trade and professional associations.

Outcome 1

The first step in establishing collaborative relationships will be accomplished through the creation of the Panel of National Association Executives and its advisory group that may include as many as sixty (60) national organizations. The second step in contributing to that relationship will be the participation of the respondents in the questionnaire surveys and the interviewees in the on-site in-depth interviews. The third step will be the involvement of the Panel and advisory group members in accordance with the project procedures outlined in the Schedule of Activities in Exhibit C. It should be noted that creation of the advisory group and the development and implementation of the Schedule of Activities reflect the application of the

modified Delphi method described in Exhibit B. The culmination of these three steps is expected to result in the accomplishment of the first major objective of this research for action project: establishment of collaborative relationships among the practitioner community (trade and professional associations, licensure community (state regulatory agencies), program-approval community (regional and specialized accrediting bodies), and certification community (certifying organizations).

Proposed Project Resources

The Accrediting Council for Continuing Education and Training (ACCET), the only U.S. Department of Education accreditation-approved body that accredits only nondegree continuing education programs, provided funding for the literature search (described in Chapter IV). That funding enabled the writer to enroll in the National Academy In-residence Program at the Ohio State University Center on Education and Training for Employment (CETE).

The Center, through its In-residence Program, provided access to over 200 computer bases and to its ERIC Clearinghouse on Adult, Career and Vocational Education. It facilitated the computer screening of the Encyclopedia of Associations' 22,000 national associations leading to the disclosure of over 900 national associations with continuing education/training programs that appear to be eligible to apply for accreditation by ACCET. If funding can be obtained, it offered to provide an educational program specialist who has access to its Program Improvement Division and its Product Review Exchange. The Program Improvement Division is responsible for studies conducted by the Center. Its expertise includes designing and implementing questionnaires and on-site interviews. The Product Review Exchange arranges for review of working drafts of reports by internal (Center) and external experts in the areas being investigated.

Chapter IV

OUTCOME 2: DEVELOPING THE CPE MODEL

The second intended outcome of this proposed project is the development of a model of excellence for accreditation of CPE programs for practitioners in professional fields including those occupational and professional practitioners for whom state licensure is required. As mentioned in Chapter III, it wass suggested that licensure, another component in the credentialing process, not play a significant role in the proposed project. Licensure is a complex area that includes governmental (state) authorization of institutions offering CPE programs and state licensing of practitioners in selected occupational and professional fields. The project is concerned only with nongovernmental credentialing.

Rationale for Developing the CPE Model First

Also mentioned in Chapter III was the recommendation that the proposed project concentrate on accreditation and leave the topic of certification (another component in the credentialing process) for future study. It was pointed out that the forthcoming proposed CPE accreditation model may well serve as a departure point for the later development of a certification model. There is one caveat. Whereas accreditation has been the route for educational institutions, some national trade and professional associations have opted either for certification or licensure of individuals in their member organizations. As yet, most national associations do not offer or sponsor certification programs. Because licensure is a governmental responsibility and therefore not included in this project, no attempt has been made to identify those associations that may offer CPE programs relating to licensure.

Since only a few trade and professional associations offer certification programs, much of the literature on certification has been initiated or encouraged by two organizations both of which have been suggested as possible Panel of National Association Executives members participating in the proposed project through their chief executive officers --the American Society of Association Executives (ASAE) and the newly created National Organization for Competency Assurance (NOCA). Because of its recent establishment, NOCA has had limited opportunity to initiate or foster research on certification. However, since its primary concern is certification,,it already has stimulated research among its institutional memberships through its publications and conferences. Although certification is not its primary concern, ASAE also has been promoting research on certification through its annual conferences, publications, and participation in research projects in conjunction with the Center on Education and Training for Employment (CETE),

Ohio State University. As yet, the ASAE research activities have not concentrated on certification.

In view of the limited literature resources on certification and the fact that this project concentrates on developing a CPE accreditation model, the decision to focus primarily on accreditation in the literature review was an inevitable choice.

The Literature Review

An early decision in developing a CPE accreditation model was to consider CPE as an example of nontraditional education and to agree with writers like Seldon and Porter (1977) and Grover Andrews (1978 and 1983) that nontraditional postsecondary education is an extension of and complements traditional education. Armed with this basic assumption, it appeared feasible to include traditional as well as nontraditional postsecondary education accreditation in the review of the literature pertaining to CPE accreditation. It was anticipated that the literature review would facilitate the actual construction of the CPE model.

As can be seen from the project's Bibliography, the literature review has been based upon several diverse sources including the following:

1. The Center on Education and Training for Employment (formerly the National Center for Research in Vocational Education), Ohio State University, including the Center's National Academy with its In-Residence Program, the ERIC Clearinghouse on Adult, Career and Vocational Education, the Program Improvement Division, Product Exchange, and Research Library.

2. Computer searches through The University of Toledo library and the Center on Education and Training for Employment with its over 200 computer bases. The major descriptors used in the searches were: Accreditation, Professional Associations, and Professional Continuing Education.

   The following supplemental descriptors also were used: Accrediting Agencies, Certification, Continuing Education, Continuing Education Units, Credentialing, Licensing Examinations, Lifelong Learning, Mandatory Continuing Education, Professional Development, Professional Education, Professional Recognition, Program Validation, Quality Control, Relicensure, State Agencies, State Licensing Boards, State Standards, and Validated Programs.

3. The libraries of two national associations: American Society of Association Executives and National

Association for Competency Assurance. In addition, the library of the Council on Postsecondary Accreditation was made available to the literature reviewer.

4. The libraries of The University of Toledo, including the main library's microfiche holdings of publications generated by the computer searches, and the Medical College of Ohio at Toledo library.

5. The University of Toledo library system included two sources of information on doctoral dissertations, also identified through the computer searches: Comprehensive Dissertation Index: Five Year Cumulation 1983-1987 (1989) and Dissertation Abstracts, International (1989). In addition to reviewing dissertation abstracts, copies of selected dissertations were obtained both through the interlibrary loan service of The University of Toledo and the University Microfilms International Dissertation Information Service.

6. Correspondence with several writers identified through the computer searches including Grover J. Andrews, Association Director for Instructional Services, Georgia Center for Continuing Education, The University of Georgia; Gloria Chernay, Director of Constituent Services, Council on Postsecondary Accreditation; Frances M. Maitland, Assistant Secretary, Accreditation Council for Continuing Medical Education; Louis Phillips, Louis Phillips and Associates; and Benjamin Shimberg, Senior Research Scientist, Division of Measurement Research and Services, Educational Testing Service.

7. Correspondence, accompanied by publications, with the Accreditation Council for Continuing Medical Education; Accreditation Council for Continuing Education and Training; American Society of Allied Health Professions; Commissions of Higher Education of the regional and national accrediting bodies in the Council on Postsecondary Accreditation; Defense Activity for Non-Traditional Education Support; Education Commission of the States; National Clearinghouse on Licensure, Enforcement and Regulation, Council of State Governments; National University Continuing Education Association; Ohio Board of Regents; and Ohio Continuing Higher Education Association.

8. Publications of the U.S. Department of Education, principally its 1989 Nationally Recognized Accrediting Agencies and Association: Criteria and Procedures for Listing by the U.S. Secretary of

Education and Current List.

Accreditation Purposes and Outcomes

Although the bulk of the literature review was conducted in the early on in this project, it actually continued up to the recently completed stage of constructing a proposed working draft of the CPE accreditation model. The literature review was helpful in determining what should be the purposes and outcomes of CPE accreditation. Determining those purposes and outcomes is a prerequisite for the construction of a CPE model. For that reason, an analysis of pertinent selections from the literature review pertaining to purposes and outcomes was presented in Chapters I and II.

An examination of the project Bibliography will reveal the extensive review of the literature entailed in this project. Much of the literature review, including an examination of publications issued by COPA and the regional, national, and specialized accrediting bodies comprising COPA, resulted in an awareness of the diversity of objectives in the accreditation field. That diversity is reflected in the specificity of essential characteristics in the proposed working draft of the CPE Accreditation Model in Chapter V. At the same time, as Selden and Porter demonstrated in their publication, Accreditation: Its Purposes and Uses (1977), it is possible to consolidate the comprehensive listing of essential characteristic, purposes, and uses of CPE accreditation into four major outcomes. A CPE accrediting body should:

1. Establish minimum education standards for accreditation and reaccreditation of those institutions and programs opting for membership.

2. Insist on the maintenance at all times of minimum standards of performance for the protection of the public, the institutions or programs, and their graduates.

3. Stimulate continued self-improvement by the member institutions or programs.

4. Protect the institutions or programs from improper external or internal pressures.

Once the purposes and outcomes of CPE accreditation are determined, it becomes necessary to decide who should be the users of the CPE accreditation model in Chapter V.

The Users of the Proposed CPE Accreditation Model

The intended users of the CPE accreditation model include the following:

1. Those accrediting bodies that deal with institutions

whose primary purpose is to provide postsecondary degree study consisting of credit programs and that also offer nondegree/noncredit programs. Examples are the regional agencies like the North Central Association of Colleges and Schools and the Southern Association of Colleges and Schools and the national agencies like the American Association of Bible Schools and the Association of Independent Colleges and Schools that offer institutional accreditation.

2. Those specialized accrediting bodies that, like the institutional accrediting agencies, deal with institutions whose primary purpose is to provide postsecondary degree study consisting of credit programs and that also offer nondegree/noncredit programs. Examples are the American Assembly of Collegiate Schools of Business and the Council on Chiropractic Education that offer programmatic accreditation.

3. Those specialized accrediting agencies that offer sponsor-approval services to providers of continuing education activities. Examples are the American Speech-Language-Hearing Association and the American Council on Pharmaceutical Education.

4. Those accreditation agencies that provide accreditation services to institutions whose primary offerings are classified as nontraditional education. An example is the National Home Study Council.

5. Those national trade and professional associations that provide accreditation services to their institutional memberships. An example is the Accreditation Council for Continuing Medical Education.

Having determined the purposes and outcomes of CPE accreditation and identified the prospective users of a CPE accreditation model, the next step is to decide upon the methodology for constructing the model.

Model Construction Methodology

Assumptions were the starting point in constructing the proposed model. Those assumptions were:

1. CPE accreditation is an extension of and complements postsecondary credit accreditation.

2. CPE accreditation is concerned primarily with noncredit postsecondary education programs that may be traditional or nontraditional in respect to subject matter, students, and delivery systems.

3. The CPE accreditation model must encompass the standards, policies, and procedures of the U.S. Department of Education as spelled out in its 1989 publication entitled Nationally Recognized Accrediting Agencies and Associations: Criteria and Procedures for Listing by the U.S. Secretary of Education and Current List and of the Council on Postsecondary Accreditation as presented in its 1989 The COPA Handbook.

4. The CPE accreditation model must be comprehensive in order to be able to: (a) accommodate the variety of accrediting bodies already approved by COPA and/or recognized by USDOE, (b) encourage strengthening of accrediting services provided by national trade and professional associations, and (c) provide for possible expansion of accreditation services by existing or future accrediting bodies.

The rationale for the first two assumptions has been presented in some detail in Chapters I and II. Now is the time and place for delineating the dominating influence of the U.S. Department of Education and the Council on Postsecondary Accreditation in CPE accreditation.

The Roles of COPA and USDOE in Accreditation

As mentioned before, COPA is the "umbrella" organization for providing leadership in postsecondary education accreditation. It is the voluntary accreditation-approval agency for 57 accrediting bodies that accredit degree-granting collegiate institutions. COPA approves only those accrediting bodies whose standards are compatible with those of COPA.

The U.S. Department of Education (USDOE) recognizes (approves) only those accrediting bodies whose standards, policies, and procedures comply with those of USDOE. Federal funds for postsecondary education, including continuing professional education programs, can be obtained only if the programs are accredited by accrediting bodies approved by USDOE.

Model Development: Phase One

The interlocking accrediting activities of COPA and USDOE, in effect, constitute an ironclad control of legitimate accreditation in the United States. Any accreditation model would have to accommodate the policies, procedures, and standards of both agencies. Hence, the first phase in creating the proposed model was to examine the two publications, The 1989 COPA Handbook and the 1989 Nationally Recognized Accrediting Agencies and Associations: Criteria and Procedures for Listing by the U.S. Secretary of Education Current List in order to identify the all the accreditation policies, procedures, and standards of each of the two

agencies.

That effort was greatly facilitated by a study made by Dr. Marjorie Peace Lenn, then Director of Professional Services and now Vice President of COPA, that culminated in a report entitled "A Comparative Analysis of the July, 1988 Criteria of the U.S. Department of Education and the July, 1987 Provisions of the Council on Postsecondary Accreditation Concerning the Recognition of Accrediting Bodies" (Lenn, 1988). She found that....."When broken down into their component parts, there is a total of about fifty-three (53) USDOE Criteria and forty-seven (47) COPA Provisions." (p.1) She also found....."about forty percent (40%) comparability between the Criteria and Provisions." (p. 2)

The proposed model includes all 53 USDOE Criteria and all 47 COPA Provisions. Lenn grouped the Criteria and Provisions into four categories. Those four categories were adapted in constructing the proposed model. They are:

1. To be considered for postsecondary Continuing Professional Education (CPE) recognition, an accrediting body (agency).....

2. To carry out its activities in the public interest, an accrediting body (agency).....

3. To meet its obligations as a CPE-accredited body, an accrediting body (agency).....

4. To foster innovation in CPE programming and encourage outreach services while maintaining appropriate quality standards among CPE sponsors (providers), an accrediting body (agency).....

Model Development: Phase Two

The compilation of the COPA Provisions and the USDOE Criteria within the Lenn framework completed the first phase of the model development. The next phase consisted of a second review of selected writings from the literature search. Over one hundred (100) publications from the Bibliography were selected for that second review. With few exceptions, the selections were restricted to those publications that appeared to be concerned with model development and with accreditation policies, procedures, and standards.

That second phase concentrated on selections emanating from research. Examples are:

1. Abrahamson. 1985. Evaluation of Continuing Education in the Health Professions.

2. American Law Institute-American Bar Association Committee on Continuing Professional Education. 1991. Attaining Excellence in CLE: Standards for Quality and Methods for Evaluation.

3. Andrews. 1978. "Assessing Nontraditional Education: A Summary of the Project Report."

4. Armstrong. n.d. "Outcomes Assessment and the Accreditation Process."

5. Chaloux. 1985. "The Project on Assessing Long Distance Learning Via Telecommunications."

6. COPA. 1985. "Report of the COPA Committee on Assessing the Validity and Reliability of Accrediting Body Standards and Process."

7. COPA. 1991. Outcomes Assessment and Analysis: A Referemce Document for Accrediting Bodies.

8. Galbraith and Gilley. 1986. Professional Certification: Implications for Adult Education and HRD.

9. Green. 1984. Continuing Education for the Health Professions.

10. International Association for Continuing Education and Training. 1991. A Practical Handbook for Assessing Learning Outcomes in Continuing Education and Training.

11. Kells and Parish. 1988. Self-Study Processes: A Guide for Postsecondary and Similar Service-Oriented Institutions and Programs.

12. Maitland. 1990. "CME: Accreditation of Sponsors & Certification of Credit."

13. McCullough and Andrews. 1978. A Taxonomy for Classification and Determination of the Nontraditional Nature of Postsecondary Institutions.

14. Petersen. 1979. A Current Profile: Accrediting Standards and Guidelines: A Study of the Evaluative Standards and Guidelines of 52 Accrediting Agencies Recognized by the Council on Postsecondary Accreditation.

15. Selden and Porter. 1974. Accreditation: Its Purposes and Uses.

16. Shimberg. 1983. "The Relationship Among Accreditation, Certification and Licensure."

17. State Higher Education Executive Officers. 1991. The Methods and Effectiveness of State Licensing of Proprietary Institutions.

18. Stufflebeam. 1985. "The Relevance of the Joint Committee Standards for Improving Evaluations in Continuing Education in the Health Professions."

19. Willingham. 1977. Principles of Good Practice in Assessing Experiential Learning.

Model Development: Phase Three

The third phase consisted of two operations. One was to test the feasibility of the Lenn taxonomy in model construction. Although several research projects produced classification systems that could have been used in this proposed project, none appeared to be superior to the Lenn taxonomy.

The second operation resulted in a working list of items (essential characteristics) to consider adding to the COPA/USDOE components. That list, in addition to the COPA/USDOE compilation, served as a reference point in phases four and five.

Model Development: Phase Four

The fourth phase of the model development involved correspondence with several individuals and organizations (see The Literature Review earlier in this chapter) in order to obtain and review guidelines for continuing education and accreditation developed by state and national organizations that are concerned with but do not have direct responsibilities for CPE accreditation. Examples of organizations (included in the Bibliography) are:

1. Council on the Continuing Education Unit. 1984. Principles of Good Practice in Continuing Education. (The Council has been renamed International Association for Continuing Education and Training)

2. CEU. 1986. The Continuing Education Unit Criteria and Guidelines.

3. Danzberger and Blank. 1985. "Accredited Training for Work."

4. Education Commission of the States. 1973. Model State Legislation. Report of the Task Force on Model State Legislation for Approval of Postsecondary Educational Institutions and Authorization to Award Degrees.

5. National University Continuing Education Association. n.d. "Guidelines for the Assessment and Evaluation

Instructional Programs of Continuing Education."

6. NUCEA. 1984. "The Role of Colleges and Universities in Continuing Professional Education."

7. Ohio Board of Regents. 1984. "Standards for Noncredit Continuing Education."

Model Development: Phase Five

The guidelines reviewed through the literature search in phase four suggested additional items for the proposed model. However, the greatest assistance for strengthening the proposed model came in phase five. As can be seen from scanning the Bibliography, COPA and its affiliated accrediting bodies have been involved in or responsible for much of the research and many of the publications related to improving the accreditation system in postsecondary education including continuing education and nontraditional education. Findings and recommendations resulting from their research and publications were included in the evolving model of excellence for CPE accreditation.

Correspondence with all five (5) of the national institutional accrediting bodies such as the American Association of Bible Colleges and the Association of Independent Colleges and Schools and 8 of the 9 regional institutional accrediting bodies such as the North Central Association of Colleges and Schools and the Accrediting Commission for Community and Junior Colleges of the Western Association of Schools and Colleges recognized by COPA resulted in obtaining copies of their manuals and handbooks on policies, standards, and procedures for postsecondary education accreditation. Those publications revealed that some of the Commissions on Higher Education were exceeding COPA requirements in continuing education and nontraditional education. Those pioneering efforts were added to the emerging CPE model. Those same pioneering efforts may have been influential in the recently completed COPA project, supported by the Fund for the Improvement of Postsecondary Education of USDOE, entitled "Accreditation for Educational Effectiveness: Assessment Tools Improvement." It was a two-year project that produced two reports entitled Outcomes Assessment and Analysis: A Reference Document for Accrediting Bodies (1991) and Accreditation, Assessment and Institutional Effectiveness (1992).

Correspondence, supplemented with publications on policies, standards, and procedures, was conducted with the Accreditation Council for Continuing Medical Education (ACCME) and the Accrediting Council for Continuing Education and Training (ACCET). Although ACCET is recognized by USDOE, it is not accredited by COPA. ACCME is neither accredited by COPA nor recognized by USDOE. Both accrediting bodies are involved only with noncredit postsecondary

education programs and institutions. Neither includes collegiate credit educational programs in its jurisdiction.

ACCME is....."responsible for continuing medical education accreditation of medical schools, state medical societies, and other institutions and organizations that design their CME activities for a national or regional audience of physicians. The Council, established on January 1, 1981, is sponsored by seven national organizations: The American Board of Medical Specialities, the American Hospital Association, the American Medical Association, the Association for Hospital Medical Education, the Association of American Medical Colleges, the Council of Medical Speciality Societies, and the Federation of State Medical Boards." (American Medical Association, 1986, p. 1)

ACCET is....."a voluntary group of educational organizations affiliated for the purpose of improving continuing education and training. Through its support of an independent Accrediting Commission, the ACCET membership promulgates and sustains the Standards for Accreditation along with policies and procedures that measure and assure educational standards of quality." (Accrediting Council for Continuing Education and Training, 1990. "Document 1: The Accreditation Plan: Policies and Procedures," p. 1. In the "Interim Report to the Secretary of Education.")

Both organizations deal only with noncredit continuing professional education accreditation. Each is organized differently and serves different clienteles. ACCET recently underwent a periodic review by USDOE. That review resulted in several substantive changes in its operation. Those changes reflect one of the most recent applications of the USDOE Criteria for the Recognition of Accrediting Agencies. The Criteria currently are being reviewed for future revision according to an article in The Chronicle of Higher Education (Jaschik 17 April 1991 p. 22).

Because of their exclusive commitment to continuing professional education accreditation, the two organizations provided components for the emerging CPE accreditation model not suggested by other sources of information in the earlier phases of the model development.

The Need for a Comprehensive Model

The initial draft of the proposed CPE accreditation model is an unusually comprehensive one. The variety of accreditation agencies already officially approved or recognized by the Council on Postsecondary Accreditation and the U.S. Department of Education requires a comprehensive model. The increasing number of trade and professional associations offering accreditation services, not yet eligible for official approval or recognition by COPA or USDOE, adds to the need for a comprehensive model. The

growing interest in nontraditional subject matter and nontraditional postsecondary education delivery systems must be accommodated in any CPE model and thus fuels the need for a comprehensive model.

Although not explored in this project, there is another area of possible accreditation service. In recent years there has been a tremendous growth in corporate education programs ranging from literacy training to top-management in an effort to be competitive in a global environment. It is likely that not all of these programs can be serviced through most of the existing accrediting bodies as they are now constituted. The proposed CPE model attempts to encourage the existing COPA/USDOE accrediting agencies to expand their horizons and to provide guidelines to national trade and professional associations interested in providing accreditation services to their member institutions.

The expansion of the horizons is the motive for including the fourth Lenn-adapted category:

> .....To foster innovation in CPE programming and encourage outreach services while maintaining appropriate quality standards among CPE sponsors (providers), an accrediting body (agency).....

A Caveat and an Illustration

It should be understood that not all accrediting bodies should be expected to comply with all of the components in the model. Each accrediting agency has its own distinctive objectives and particular clientele. Each agency should select those components (Essential Characteristics) which are compatible with its mission and defined area of service. At the same time each agency should be alert to the possibility that it may want to consider additional components so as to strengthen its current area of service and perhaps even to expand its mission.

A possible example of a component from the CPE accreditation model that some trade and professional associations may want to consider is:

1.4.2 Accredits CPE programs provided or sponsored by applying and eligible national associations that:

(a) Have administratively independent accreditation governing boards whose memberships include required representatives from the institutions in the associations and the general public and optional representatives from government, industry, and the education professions.

An Explanation and the Glossary

As outlined in Exhibit C: Schedule of Activities, the working draft of the proposed model is to be submitted to the panel members and then to the advisory group members. The Delphi tool will be used with both the panel members and the advisory group members in developing the final working version of the proposed model before the model is included in the questionnaire surveys and on-site in-depth interviews.

The Schedule of Activities contains two terms that are not included in the Glossary. They are: (1) Project Coordinator (PC), and (2) Project Liaison (PL). It is assumed that if the proposed project is implemented that someone will be designated to serve as the Project Coordinator or possibly as Project Director. It is also assumed that an agency such as the Ohio State University Center on Education and Training for Employment and that the agency will designate a staff member to work with the Project Coordinator and the Panel of National Association Executives in a liaison role between them (the project) and the Center.

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Chapter V

CPE ACCREDITATION MODEL: ESSENTIAL CHARACTERISTICS

1.0 To be considered for postsecondary Continuing Professional Education (CPE) recognition, an accrediting body (agency).....

1.1 Is a nongovernmental body (agency).

1.2 Applies for recognition of the full scope of the CPE accrediting and reaccrediting activities for which it assumes responsibility.

1.3 Conducts specialized accreditation on a national basis; or conducts institutional accreditation on a national or regional basis.

1.3.1 Includes in its regional geographical scope of operation at least three States that are contiguous or that otherwise constitute a distinct geographic region, and defines its accrediting activity as the accreditation of entire institutions.

1.3.2 Includes in its national geographical scope state accrediting bodies that accredit local institutions and programs which comply with the standards, policies, and procedures of the national institution or program.

1.3.2.1 Evaluates at reasonable intervals the state accrediting bodies that have been delegated authority to grant accredited or preaccredited status to CPE institutions and programs.

1.4 Accredits those institutions or programs that are legally authorized under applicable State law to provide nondegree postsecondary education programs.

1.4.1 Such authorized institutions or programs have administratively independent governing boards that represent the public interest and reflect the enrolled participant constituency.

(a) A public member shall not be a member of the credentialed profession, an employee of the profession, or an employee of the accrediting body.

1.4.2 Accredits CPE programs provided or sponsored by applying and eligible national associations that:

(a) Have administratively independent accreditation governing boards whose memberships include required representatives from the institutions in the

associations and the general public and optional representatives from government, industry, and the education professions.

(b) Offer nondegree postsecondary education programs that are compatible with the applicable State law on such programs in those states in which the programs are offered.

(c) Restrict enrollments to their individual members and may require or recommend licensure or certification of the individual members for continued membership through successful completion of mandatory or voluntary CPE programs.

(d) Establish administratively separate entities with adequate financial resources for accrediting CPE programs offered:

(1) by the associations, or (2) by contractual agreements with other agencies, or (3) jointly with other agencies.

1.4.3 Accredits on-campus and off-campus institutional units which offer CPE programs that comply with the standards, policies, and procedures of the host institutions.

1.4.4 Permits CPE-accredited institutions, including approved units, to enter into contractual agreements with non-accredited providers/sponsors of CPE programs when their programs comply with the standards, policies, and procedures of the CPE-accredited institutions and/or units.

1.4.5 Permits CPE-accredited programs to enter into contractual agreements with non-accredited providers/sponsors of CPE programs when their programs comply with the standards, policies, and procedures of the CPE-accredited programs.

1.4.6 Holds the CPE-accredited institutions (including approved units) or programs responsible for verifying that the non-accredited programs of the contractual providers/sponsors comply with the standards, policies, and procedures of the CPE-accredited institutions or programs.

1.4.7 Includes non-accredited institutional and program providers/sponsors of CPE programs in its review of applications for reaccreditation from CPE-accredited institutions or programs that have contractual agreements with non-accredited providers/sponsors.

1.4.8 Permits CPE-accredited institutions (including approved units) and programs to jointly sponsor CPE programs with non-accredited providers/sponsors.

1.4.9 Holds the CPE-accredited institutions (including approved units) or programs in joint sponsorships responsible for verifying that the programs with the non-accredited providers/sponsors comply with the standards, policies, and procedures of the CPE-accredited institutions or programs.

1.4.10 Includes jointly sponsored programs with non-accredited providers/sponsors in its review of applications for reaccreditation from CPE-accredited institutions and programs.

1.5 Maintains and makes publicly available current written documents clearly describing the following matters:

(a) Its purposes and objectives.

(b) The geographical area and the types and academic levels of educational institutions or programs covered by the agency's accrediting activity.

(c) The definition of each type of accreditation and pre-accreditation status, including probationary status, if any, that the agency grants.

(d) The criteria and procedures used by the agency for determining whether to grant, reaffirm, reinstate, deny, restrict, or revoke each type of accreditation and preaccreditation status that the agency grants.

(e) The standards to which the agency holds an educational institution or program for the purpose of making determinations respecting each of the criteria referred to in (d) above.

(f) The procedures followed by the agency for the timely review of complaints pertaining to institutional or program quality in a manner that is fair and equitable to the person making the complaint and to the institution or program.

(g) The criteria established by the agency for selection of nationally recognized, standardized, or industry-developed tests to measure the aptitude of prospective participants who are admitted on the basis of their ability to benefit from the education or training offered.

1.6 Is solely responsible for formulating its accreditation (and reaccredition) policies, procedures, and criteria.

1.7 Is solely responsible for the final decision on accreditation (and reaccreditation) of an institution or program.

1.8 Is administratively and financially independent and does not offer or sponsor CPE programs.

2.0 To carry out its activities in the public interest, an accrediting body (agency).....

2.1 Provides evidence that its accreditation protects the interests of enrolled participants, benefits the public, and improves the quality of teaching, research, and professional practice.

2.1.1 Documents that it has sufficient experience with respect to the content and objectives and the academic awards (if any) of the CPE programs offered by the institutions and programs which it recognizes through its accreditation activities.

2.2 Provides evidence that its policies, evaluative criteria, procedures, and evaluative decisions are accepted throughout the United States by appropriate communities of interest such as educators, educational institutions, other accrediting bodies, licensing bodies, certifying organizations, national trade and professional associations, and practitioners and employers in the professional fields for which the educational institutions or programs within the agency's jurisdiction prepare their enrolled participants.

2.2.1 Provides evidence that it accepts applications for accreditation only from those institutions or programs that:

(a) Have not had prior accreditation withdrawn from a nationally or regionally recognized agency or have voluntarily withdrawn under a show cause action, within one year prior to application to another recognized accreditation agency.

(b) Have been under the same ownership and/or control for at least two (2) years prior to application.

(c) Offer education and training for individuals to enable them to acquire the knowledge and skill required for entry, maintenance and/or advancement in the professional field of their choice.

(d) Provide evidence that they have the financial resources to offer the education and training for the duration of their participants' enrollments.

(e) Provide documentation for implementing follow-up procedures for enrollees who obtain state and/or federal loans in order to achieve default rates that meet or exceed state and/or federal regulations.

2.3 Develops and interprets its evaluative criteria to encourage institutional and program freedom and autonomy, the improvement of institutions and programs, sound educational experimentation, and constructive innovation.

2.3.1 Provides evidence that it encourages institutions and programs to offer equity of opportunity to an increasingly diverse staff and clientele population.

2.4 Has effective, impartial, and objective public representation in its evaluative, policy, and decision making processes; and whenever appropriate, retains advisors who can provide information about issues of concern to the public.

2.5 Makes public a current listing of the accreditation or candidacy of all institutions or programs within the agency's scope of operation and the date of the next currently scheduled review or reconsideration of accreditation of each of those institutions or programs.

2.5.1 Reevaluates at reasonable intervals institutions and programs to which it has granted accredited or pre-accredited status.

2.6 Makes public all final decisions granting or withdrawing the accreditation (or candidacy for accreditation) of institutions or programs, including decisions by institutions or programs to withdraw voluntarily from accreditation (or candidacy).

2.7 Provides appropriate and fair procedures for considering and acting upon applications for accreditation or pre-accreditation from institutions or programs.

2.8 Provides appropriate and fair written procedures for appeals from decisions refusing or terminating accreditation (or candidacy) of an institution or program. Such written procedures:

(a) Include consideration by a body whose members did not participate in the original decision.

(b) Maintain the accreditation (or candidacy) status of the institution or program until completion of the appeal process.

(c) Shall be made promptly available to the executive official of any institution or program affected by such a change in status.

2.9 Has adopted policies defining what information about an institution or program it will reserve or keep confidential and what information it will make available to the public.

2.10 Has mechanisms to provide public correction of incorrect or misleading statements about: (a) the accreditation status of an accredited (or candidate) institution or program, and (b) the contents of reports of site visitors and/or its accrediting actions.

2.11 Responds to inquiries from the public about its activities and about its accredited (or candidate) institutions or programs.

2.12 Makes available upon request the names, relevant employment, organizational affiliations, and the academic and professional qualifications of individuals in its accrediting activities including the members of its policy and decision making bodies and its administrative personnel.

2.13 Undertakes timely and appropriate analysis of its own objectives, criteria, policies, and procedures to insure that they contribute to the purposes of accreditation and modifies them to achieve these purposes better and to meet changing conditions.

2.13.1 Maintains a systematic program of review designed to assess the validity and reliability of its criteria, procedures, and standards relating to its accrediting and preaccrediting activities and their relevance to the educational and training needs of enrolled participants in the institutions and programs that it accredits.

(a) Provides evidence that the evaluation mechanisms include attempts to establish both reliability and validity for each form of evaluation used.

2.14 Bases its decisions regarding the award of accreditation or preaccreditation status upon its published criteria and provides advance public notice of proposed changes in its objectives, criteria, and evaluating policies giving adequate opportunity for comment on such proposals by affected persons, institutions, and programs prior to their adoption.

2.15 Permits an institution or program to withdraw an application for any status of accreditation (or

candidacy) at any time before a final decision is made on that request.

2.16 Permits an institution or program to withdraw from any status of accreditation (or candidacy) at any time.

2.17 Maintains effective controls against conflict of interest and against inconsistent application of its criteria through its organization, functions, and procedures.

3.0 To follow accepted practices of CPE accreditation, an accreditation body (agency).....

3.1 Recognizes the right of an institution or program to be evaluated in the light of its own stated purposes, so long as these are consistent with purposes generally accepted as appropriate to CPE fields of study and to USDOE-recognized and COPA-approved scope of the accrediting body. (United States Department of Education and Council of Postsecondary Accreditation)

3.1.1 Encourages the institution or program to apply systematic procedures in identifying and analyzing the educational and training needs of practitioners in the occupational and professional fields that it is attempting to serve so that its educational and training activities enable its enrolled participants to improve their everyday practice.

3.2 Utilizes evaluative criteria and processes that judge:

(a) The appropriateness of institutional or program purposes; the adequacy of resources and organization to meet those purposes; the reasonable assurance of continued meeting of those purposes; and the educational outcomes which indicate that those purposes are met.

(b) Whether the institutional or program statements of objectives are stated in terms of results sought and the means by which they are to be attained.

3.2.1 Systematically utilizes substantial and accurate information on educational outcomes of CPE especially as measured by participant achievement by:

(a) Determining whether an institution or program maintains clearly specified educational objectives consistent with its mission and appropriate in the light of any academic awards it offers.

(b) Verifying that satisfaction of program completion requirements by all participants, including those admitted on the basis of ability to benefit, is reasonably documented and conforms with commonly accepted standards for comparable programs, and that institutions and programs certify satisfactory program completion and make their awards, if any, only to those participants who have demonstrated educational achievement as assessed and documented through appropriate measures.

(c) Determining that institutions or programs document the educational achievements of their participants, including those admitted on the basis of ability to benefit, in verifiable and consistent ways, such as individual project reports, reviews of participant portfolios, general educational assessments (e.g., standardized test results and, whenever applicable, school placement, job placement, rates of licensing and certifying examination results, employer evaluations, and other recognized measures.

(d) Determining that institutions or programs admitting participants on the basis of ability to benefit employ appropriate methods, such as preadmissions testing or evaluations, for determining that such participants are in fact capable of benefiting from the training or education offered.

(e) Determining the extent to which institutions or programs accurately publicize, particularly in representations directed to prospective participants, the objectives described in (a) above, the assessment measures described in (c) above, and the information obtained through those measures and the methods described in (d) above.

(f) Determining the extent to which institutions or programs systematically apply the information obtained through the measures described in (c) above towards steps to foster enhanced participant achievement with respect to: (1) program requirements for satisfactory completion and possible academic awards such as certificates, and (2) assessment processes that are valid measures of on-the-job performance requirements which emphasize competence rather than mere expertise.

3.3 In the instances of CPE activities designed for certification or licensure objectives, requires evidence that a means exists for individuals who have obtained a skill or knowledge outside organized educational settings to be evaluated prior to and during enrollments for the purpose of becoming eligible to apply for

certification or licensure.

3.4 Provides to institutions and programs appropriate consultative guidance about the accrediting process.

3.5 Evaluates an institution or program for candidacy or initial accreditation only at the invitation of the chief administrative officer of the institution or program involved; however, it will initiate a review of the accredited status of the institution or program whenever the accrediting body deems it is required.

3.6 Requires as an integral part of its accreditation process a self-analysis of the institution or program and an on-site review by a visiting team in accordance with guidance provided by the accrediting body.

3.7 Provides in its evaluation, policy, and decision making processes an appropriate balance between academic and administrative personnel (if an institutional accrediting body), or an appropriate balance between educators and practitioners (if a specialized accrediting body).

3.8 Confines it requests for data from institutions or programs to data directly related to the evaluation and accreditation processes.

3.8.1 Requires the institution or program to adhere to a uniform measure of CPE credit and documented evidence of participants' learning and satisfactory completion of CPE activities.

3.8.2 Requires the institution or program to maintain a set of limited access, permanent records of participants and accurate, readily available transcripts.

3.9 Collects data from institutions or programs by means which stimulate self-assessment and improvement and which make maximum use of information already available in the institutions or programs.

3.10 Consults with the institution or program about the number and selection of site visitors and about the length of the visit.

3.11 Provides evidence that its practices respecting the number of site visitors and visit length appropriately reflect the complexity of the institution or program being visited and the purposes of the visit.

3.12 Appoints site visitors who are: (a) qualified by academic training, professional experience, and knowledge of the accrediting process; (b) sensitive to the uniqueness of individual institutions and programs;

and (c) impartial, objective, and without conflict of interest.

3.13 Provides for the training and evaluation of site visitors.

3.14 Encourages discussion during the on-site visit between site visitors and the faculty, staff, administrators, enrolled participants, and other interested parties.

3.15 Provides opportunity and a reasonable period for the instructional chief executive and, in the case of a specialized accrediting body, the director of the program to comment on the report of the site visitors before final action is taken on the accreditation status of an institution or program.

3.16 Provides to the institutional chief executive and, in the case of a specialized accrediting body, the director of the program a written evaluation report which the institution or program is free to distribute.

3.17 Provides to the institutional chief executive and, in the case of a specialized accrediting body, the director of the program written notification of any decision affecting the status of the institution or program not later than one month following the decision, giving reasons for the action.

3.18 Clearly distinguishes in the written report of the site visitors and in the communication of the final accrediting decision between: (a) statements speaking to actual or potential deficiencies in meeting criteria, and (b) statements offering advice to the institution or program.

3.19 Provides reasonable checks and balances in its procedures to guard against: (a) accrediting an institution or program that does not meet its criteria, and (b) refusing to accredit or review accreditation of an institution or program that does meet its criteria.

3.20 Has the staff and financial resources to implement and maintain effective accrediting procedures.

4.0 To meet its obligations as a CPE-recognized body, an accrediting body (agency).....

4.1 Advises the appropriate approving agency such as the Council on Postsecondary Accreditation (COPA) or the United States Department of Education (USDOE) before effecting any change which will alter its status of CPE recognition.

4.1.1 Includes in its advising such changes as:

(a) Institutional or program ownership.

(b) Institution or program location.

(c) Installation of branches or other types of off-campus learning centers.

4.2 Provides evidence of continuing efforts to work with other CPE-recognized accrediting bodies in cooperative accrediting practices.

4.2.1 Promptly reviews the accreditation or preaccreditation status it previously granted an institution or program to determine if there is cause for it to withdraw or otherwise alter that status whenever it learns that another recognized agency has placed that institution or program on public probation or revoked its accreditation.

4.3 Files regularly with the appropriate approving agency such as COPA or USDOE materials pertaining to its activities and complies with requests by that agency for other data or information.

4.3.1 Provides evidence that it requires institutions and programs to demonstrate the adequacy and accuracy of information made available to the public and prospective participants in the following areas:

(a) The institution's or program's resources, admission policies and standards (including nondiscrimination as to age, sex, race, religion, national origin, handicap, or marital status), academic offerings, policies with respect to satisfactory academic progress, fees and other charges, refund policies, and graduation rates and requirements.

(b) The institution's or program's educational effectiveness as described in item 3.2.1 above.

(c) Employment of recent alumni related to the education or training offered, in the case of an institution or program offering training to prepare participants for gainful employment in a recognized occupation, or where the institution or program makes claims about the rate or type of employment of graduates.

5.0 To foster innovation in CPE programming and encourage outreach services while maintaining appropriate quality standards among CPE sponsors and providers, an accrediting body (agency).....

5.1 Provides evidence that it requires adherence to its guidelines for the maintenance of standards: (a) for the recognition of independent learning (including correspondence and home study), (b) for long distance learning by telecommunications, and (c) for certification and licensure programs.

5.1.1 Independent learning may include: (a) such devices as printed, recorded, or computer-assisted instructional materials which may be used over time at various locations and which, in themselves, constitute a planned activity of continuing professional education, and (b) learning activities such as study groups, clinical case studies, professional visitations, resident training, and internships conducted under the auspices of provider/sponsor-approved supervisors.

5.1.1.1 The following elements are to be included in its guidelines for Independent Learning (IL):

(a) Design and use of IL materials and learning activities must be consistent with the provider/sponsor's overall CPE mission statement.

(b) IL materials and learning activities must be based on identified CPE needs of specific target groups of practitioners.

(c) The provider/sponsor must develop explicit objectives for each item of IL materials and learning activities and must communicate these objectives to the prospective participants.

(d) The medium (or combination of media) and learning activity (or combination of learning activities) chosen by the provider/sponsor must be consistent in content and method with the stated objectives, and the method of delivery should allow for and encourage active involvement of the participants including feedback and reinforcement of the learned knowledge or skill.

(e) Every provider/sponsor must evaluate each unit of IL material at least once every three years and each learning activity at least once per year or more frequently if indicated by new developments in the occupational/professional field.

(f) Providers/Sponsors of IL materials and learning activities must have a mechanism to record and, when authorized by the participating enrollee, to verify participation.

(g) In instances of joint sponsorship, an accredited provider/sponsor must assume ongoing responsibility for the planning, proper use, and evaluation of the IL materials and learning activities in a CPE program.

5.1.2 Long distance learning by telecommunications may include in its primary mode of delivery: (a) such mechanisms as television, video cassette or disc, film, radio, computer, or other devices which build upon the audio-visual format, and (b) such supporting services as textbooks, study guides, library resources and other study aids, and personal interactions with faculty, tutors, or other educational personnel by telephone, mail, or in face-to-face meetings.

5.1.2.1 The following elements are to be included in its guidelines for long distance learning by telecommunications:

(a) Design and use of delivery mechanisms and supporting services must be consistent with the provider/sponsor's overall CPE mission statement.

(b) Telecommunication mechanisms and supporting services must be based on identified CPE needs of specific target groups of practitioners.

(c) The provider/sponsor must develop explicit objectives for each telecommunication mechanism and supporting service and must communicate these objectives to the prospective participants.

(d) The telecommunication mechanism (or combination of mechanisms) and supporting service (or combination of services) chosen by the provider/sponsor must be consistent in content and format with the stated objectives, and should allow for and encourage active involvement of the participants including feedback and reinforcement of the learned knowledge or skill.

(e) The provider/sponsor must evaluate annually the application of the telecommunication delivery systems employed that year or more frequently if indicated by new developments in the professional field.

(f) Providers/Sponsors of telecommunication services must have a mechanism to record and, when authorized by the participating enrollee, to verify participation.

(g) In instances of joint sponsorship, an accredited provider/sponsor must assume ongoing responsibility for the planning, proper use, and evaluation of the telecommunication services in a CPE program.

5.1.3 Many states have established standards for certification/recertification and licensure/relicensure of practitioners in an increasing number of professional fields.

5.1.3.1 The following elements are to be included in its guidelines for certification/recertification and licensure/relicensure programs:

(a) Advisory committees should be established to assist in program development, support, review, and modification.

(b) Programs should remain current with state and national standards.

5.2 Provides evidence that it requires adherence to its guidelines for the maintenance of standards for the appropriate uses of commercial support in CPE activities.

5.2.1 Includes the following elements in its guidelines for the appropriate uses of commercial support:

(a) Selection, use, and evaluation of commercially offered materials must be consistent with the provider/sponsor's overall mission statement.

(b) Commercially sponsored materials must be based upon identified needs of specific target groups of practitioners.

(c) Generic names of commercially sponsored products should be used in CPE activities.

(d) Accredited providers/sponsors are responsible for the quality, content, and utilization of CPE materials prepared with the support of commercial organizations.

(e) Commercially offered financial aid must be acknowledged in printed announcements and brochures, and dispersal of residual funds should

be the responsibility of the accredited provider/ sponsor.

(f) In instances of joint sponsorship with other CPE providers/sponsors, the accredited provider/ sponsor must assume ongoing responsibility for the planning, proper use, and evaluation of the commercially provided materials in a CPE activity.

(g) Commercial exhibits and commercially sponsored social functions should not influence the planning, implementation, and evaluation of the educational events of accredited providers/sponsors of CPE activities.

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Exhibit A

POTENTIAL ADVISORY GROUP MEMBERS:
ORGANIZATIONS CONCERNED ABOUT CREDENTIALING

Alliance for Continuing Medical Education
American Association for Adult and Continuing Education
American Association of Collegiate Registrars and Admissions Officers
American Association of Community and Junior Colleges
American Association for Higher Education
American Association of State Colleges and Universities
American College Testing Program
American Council on Education
American Educational Research Association
American Law Institute-American Bar Association Committee on Continuing Professional Education
American Society of Allied Health Professions
American Society for Training and Development
American Vocational Association
Association of American Colleges
Association of American Medical Colleges
Association of American Universities
Association for Continuing Higher Education
Association of Continuing Legal Education Administrators
Association for Educational Communications and Technology
Association of Governing Boards of Universities and Colleges
Association for Media-Based Continuing Education for Engineers
Association of Research Libraries
Association for the Study of Higher Education

Carnegie Foundation for the Advancement of Teaching
Clearinghouse for Licensure, Enforcement and Regulation
Coalition of Adult Education Organizations
Commission for Interprofessional Education and Practice
Commission on Independent Colleges and Universities
Council for Adult and Experiential Learning
Council for the Advancement and Support of Education
Council of Independent Colleges

Defense Activity for Non-Traditional Education Support

Education Commission of the States
Educational Testing Service
Educators for Social Responsibility

Federation of Associations of Regulatory Boards
Fund for the Improvement of Postsecondary Education

Independent Sector
Institute of Lifetime Learning
International Association for Continuing Education and Training (formerly Council on the Continuing Education Unit)

National Alliance of Business
National Association of State Judicial Educators
National Association of State Universities and Land-Grant Colleges
National Center for Higher Education Management Systems
National Center for State Courts
National Civic League
National Community Education Association
National Conference of State Legislatures
National Governors' Association
National Institute for Work and Learning
National Judicial College
National Research Council
National Science Foundation
National Society for Internships and Experiential Learning
National Society for Performance and Instruction
National University Continuing Education Association

Pharmaceutical Association for Continuing Medical Education

Society for the Advancement of Continuing Education for the Ministry
Society of Medical School Directors of Continuing Medical Education
Southern Regional Education Board
State Higher Education Executive Officers Association
State Justice Institute

Western Interstate Commission for Higher Education

Addresses

Alliance for Continuing Medical Education
P.O. Box 401
Lake Bluff, IL 60044
(708)624-6405
Francis Maitland, Executive Vice President

American Association for Adult and Continuing Education
1112 16th Street, N.W., Suite 420
Washington, DC 20036
(202)463-6333
Dr. Drew W. Allbritten, Executive Director

American Association of Collegiate Registrars and Admissions Officers
One Dupont Circle, N.W., Suite 330
Washington, DC 20036
(202)293-9161
Dr. Wayne E. Becraft, Executive Director

American Association of Community and Junior Colleges
National Center for Higher Education
One Dupont Circle, N.W., No. 410
Washington, DC 20036
(202)293-7050
Dale Parnell, President

American Association for Higher Education
One Dupont Circle, N.W., Suite 600
Washington, DC 20036
(202)293-6440
Russell Edgerton, President

American Association of State Colleges and Universities
One Dupont Circle, N.W.
Washington, DC 20036
(202)293-7070
Allan W. Olstar, President

American College Testing Program
Box 168
Iowa City, IA 52243
(319)337-1000
Richard L. Ferguson, President

American Council on Education
One Dupont Circle, N.W., Suite 800
Washington, DC 20036
(202)293-9300
Robert A. Atwell, President

American Educational Research Association
1230 17th Street, N.W.
Washington, DC 20036
(202)223-9485
William J. Russell, Executive Officer

American Law Institute-American Bar Association Committee
on Continuing Professional Education
4025 Chestnut Street
Philadelphia, PA 19104
(215)243-1600
Donald M. Maclay, Deputy Executive Director

American Society of Allied Health Professions
1101 Connecticut Avenue, N.W., Suite 700
Washington, DC 20036
(202)857-1150
Carolyn M. Del Polito, Executive Director

American Society for Training and Development
Box 1443
1630 Duke Street
Alexandria, VA 22313
(703)683-8100
Curtis E. Plott, Executive Vice-President

American Vocational Association
1410 King Street
Alexandria, VA 22314
(703)683-3111
Charles H. Buzzell, Executive Director

Association of American Colleges
1818 R Street, N.W.
Washington, DC 20009
(202)387-3760
John W. Chandler, President

Association of American Medical Colleges
One Dupont Circle, N.W., Suite 700
Washington, DC 20036
(202)828-2400
Dr. Robert G. Petersdorf, President

Association of American Universities
One Dupont Circle, N.W., Suite 730
Washington, DC 20036
(202)466-5030
Robert M. Rosenzweig, President

Association for Continuing Higher Education
Vice Chancellor for Undergraduate Education
Indiana University-Purdue University at Indianapolis
620 Union Drive, Rm 143
Indianapolis, IN 46202
Scott E. Evanbeck, Executive Vice-President

Association of Continuing Legal Education Administrators
750 North Lake Shore Drive
Chicago, IL 60611
(312)988-6196
David L. Stretch, Executive Director

Association for Educational Communications and Technology
1126 16th Street, N.W.
Washington, DC 20036
(202)466-4780
Stan Zenor, Executive Director

Association of Governing Boards of Universities and Colleges
One Dupont Circle, N.W., Suite 400
Washington, DC 20036
(202)296-8400
Robert L. Gale, President

Association for Media-Based Continuing Education for Engineers
430 Tenth Street, N.W., Suite S208
Atlanta, GA 30318-5755
(404)894-3362
Dr. Raymond E. Morrison, Executive Director

Association of Research Libraries
1527 Hampshire Avenue, N.W.
Washington, DC 20036
(202)232-2466
Duane Webster, Executive Director

Association for the Study of Higher Education
Department of Educational Administration
Texas A & M University
College Station, TX 77843
(409)845-0393
D. Stanley Carpenter, Executive Director

Carnegie Foundation for the Advancement of Teaching
5 Ivy Lane
Princeton, New Jersey 08540
(609)452-1780
Dr. Ernest L. Boyer, President

Clearinghouse for Licensure, Enforcement and Regulation
Iron Works Pike
P.O. Box 11910
Lexington, KY 40578
(606)252-2291
Eugene Ketchum, Executive Director

Coalition of Adult Education Organizations
One Dupont Circle, N.W., Suite 1B-20
Washington, DC 20036
(202)939-7475
Dr. Roger H. Sublett, President

Commission for Interprofessional Education and Practice
111 Oxley Hall
The Ohio State University
1712 Neil Avenue
Columbus, Ohio 43210-1219
(614)292-5621
Dr. Luvern L. Cunningham, Director

Commission on Independent Colleges and Universities
17 Elk Street
Albany, New York 12224
(518) 436-4781
C. Mark Lawton, President

Council for Adult and Experiential Learning
223 W. Jackson Blvd., Suite 510
Chicago, IL 60606
(312)922-5909
Dr. Pamela Tate, President

Council for the Advancement and Support of Education
11 Dupont Circle, N.W., Suite 400
Washington, DC 20036
(202)328-5900
Virginia Carter Smith, Interim President

Council of Independent Colleges
One Dupont Circle, N.W., Suite 320
Washington, DC 20036
(202)466-7230
Dr. Allen P. Splete, President

Defense Activity for Non-Traditional Education Support
Pensacola, FL 32509-7400
(904) 452-1745
Barry L. Cobb, Ph.D., Director

Education Commission of the States
300 Lincoln Tower Bldg.
1860 Lincoln Street
Denver, CO 80295
(303)830-3600
Dr. Frank Newman, President

Educational Testing Service
Rosedale Road
Princeton, NJ 08541
(609)921-9000
Eleanor V. Horne, Corporation Secretary

Educators for Social Responsibility
23 Garden Street
Cambridge, MA 02138
(617)492-1764
Susan Alexander, Executive Secretary

Federation of Associations of Regulatory Boards
1735 New York Avenue, N.W., Suite 700
Washington, DC 20006
(202)783-6500
Samuel T. Balen, President

Fund for the Improvement of Postsecondary Education
7th and D Streets, S.W.
Washington, DC 20202-5175
(202)245-8091
Charles Karelis, Designated Federal Employee

Independent Sector
1828 L Street, N.W.
Washington, DC 20036
(202)223-8100
Brian O'Connell, President

Institute of Lifetime Learning
1909 K Street, N.W.
Washington, DC 20049
(202)662-4895
Dick Cartwright, Senior Education Specialist

International Association for Continuing Education and Training
1101 Connecticut Avenue, N.W., Suite 300
Washington, DC 20036
(202)857-1122
Donna F. Cantor, Executive Vice-President

National Alliance of Business
1201 New York Avenue, N.W., Suite 700
Washington, DC 20005
(202)289-2888
William H. Kolberg, President & CEO

National Association of State Judicial Educators
300 Newport Avenue
Williamsburg, VA 23187-8798
(804)253-2000

National Association of State Universities and Land-Grant Colleges
One Dupont Circle, N.W., Suite 710
Washington, DC 20036
(202)778-0818
Robert L. Clodius, President

National Center for Higher Education Management Systems
P.O. Drawer P
Boulder, CO 30301
(303)497-0301
Dennis Jones, President

National Center for State Courts
300 Newport Avenue
Williamsburg, VA 23187-8798
(804)1253-2000
Edward McConnell, President

National Civic League
1601 Grant Street, Suite 250
Denver, CO 80203
(303)832-5615
John Parr, Executive Officer

National Community Education Association
119 N. Payne Street
Alexandria, VA 22314
(703)683-6232
Staria Jewell-Kelly, Executive Director

National Conference of State Legislatures
1050 17th Street, Suite 2100
Denver, CO 80265
(303)623-7800
William T. Pound, Executive Director

National Council on Community Services and Continuing Education
Iowa Valley Community College
3700 S. Center, Box 536
Marshalltown, IA 50158
(515)752-4645
Conrad Dejardin, Executive Officer

National Governors' Association
Hall of the States
444 N. Capitol Street
Washington, DC 20001
(202)624-5300
Raymond C. Scheppach, Executive Director

National Institute for Work and Learning
1255 23rd Street, N.W., #400
Washington, DC 20037
(202)862-8845
Richard A. Ungerer, President

National Judicial College
Judicial College Building
University of Nevada
Reno, NV 89557
(702)784-6747
Judge William B. Lawless, Dean

National Research Council
2101 Constitution Avenue, N.W.
Washington, DC 20418
(202)334-2138
Philip M. Smith, Executive Officer

National Science Foundation
1800 G Street, N.W., Room 527
Washington, DC 20550
(202)357-9498
Erich Bloch, Director

National Society for Internships and Experiential Learning
3509 Haworth Drive, Suite 207
Raleigh, NC 27609
(919)787-3263
Jane C. Kendall, Executive Director

National Society for Performance and Instruction
1126 16th Street, N.W., Suite 102
Washington, DC 20036
(202)861-0777
Paul Tremper, Executive Director

National University Continuing Education Association
One Dupont Circle, Suite 420
Washington, DC 20036
(202)659-3130
Kay J. Kohl, Executive Director

Pharmaceutical Association for Continuing Medical Education
Ciba Geigy Pharmaceuticals
556 Morris Avenue
Summit, NY 07901
(201)822-4555
Robert F. Orsetti, Chairman

Society for the Advancement of Continuing Education for the Ministry
Auerbach Hall, Room 228
University of Hartford
West Hartford, CT 06117
(203)243-4350
Dr. Patricia Cremins, Executive Secretary

Society of Medical College Directors of Continuing Medical Education
Room 8364, 515 North State Street
Chicago, Illinois 60610
(312)464-4080
James C. Leist, Ed.D., President

Southern Regional Education Board
592 10th Street, N.W.
Atlanta, GA 30318-5790
(404)875-9211
Mark D. Musick, President

State Higher Education Executive Officers Association
1860 Lincoln Street, Suite 310
Denver, CO 80295
(303)830-3685
Dr. James R. Mingle, Executive Director

State Justice Institute
120 South Fairfax Street
Alexandria, VA 22314
(703)684-6100
David L. Tevelin, Executive Director

Western Interstate Commission for Higher Education
P.O. Drawer P
Boulder, CO 80301-9752
(303)497-0200
Dr. Phillip Sirotkin, Executive Director

Exhibit B

THE DELPHI: A RESEARCH TOOL

The overall methodology of this study can be summarized as research for action. Unlike much research for publication, this project's research does not purport to formulate new concepts or to initiate modifications of long established ones. Instead, the emphasis is upon the involvement of a critical mass of decision makers in evaluating and possibly improving the existing system of quality control in credentialing -- primarily accreditation and certification -- of continuing professional education.

Details on the study's research procedures were presented earlier. Here, the focus is on one of those procedures, namely, the Delphi. Often referred to as the Delphi technique, the Delphi methodology, or the Delphi approach, the Delphi can be said to be based on principles, methodology, and practice. Because of its versatility as a concept, the Delphi has been employed in a variety of research settings during the relatively few years it has been in existence.

The Delphi, as a research tool, appears to have emerged at the Rand Corporation in 1948 for technological forecasting on urgent defense problems (Sackman, 1975) In keeping with its oracular name, the early applications of Delphi dealt with predictions of the future in an expanding variety of social and economic problem areas including population growth, pollution, and taxes (Delbecq, 1975) with many of those applications being published "under corporate, government, and academic sponsorship.....in the United States and abroad, including Europe, the Soviet Union, and Japan." (Sackman, 1975, p. ix)

Judging from bibliographies recently compiled by the author and by Professor Dan Douglas of The University of Toledo (both included in the project's Bibliography), the emphasis on futurism and diversity of applications and sponsorship continued through the 1970s and into the 1980s. Two authors, Weatherman and Swenson, wrote: "Unclassified descriptions of the technique were published in the early 1960s and since then Delphi has been one of the better known methods of studying the future." (Hencley and Yates, 1974, p. 97) However, a computer search by Professor Douglas of journal articles on the Delphi published since 1986 supports a prophetic observation by Delbecq (1975, p. 84): "It [Delphi] can also be used to clarify positions and delineate differences among diverse reference groups." Both the bibliographies (primarily books) and the computer search of recent articles disclosed the continuing emphasis on futurism and the increasing diversity in the applications of the Delphi including the clarification of positions and

delineation of differences among diverse reference groups.

The concept of futurism, as revealed in the literature search, is based upon the process of forecasting. The Delphi relies upon the forecasts being made by experts in the field being studied. Those forecasts may be based upon information, perceptions, or opinions (often called judgments) of those experts (Dalkey, 1972; Hencley and Yates, 1974). The polling of the experts is a major advantage of the Delphi. One proponent of the Delphi expressed that advantage this way:

> Delphi can provide a more updated exchange of scientific or technical information than a literature search by drawing upon the current knowledge of experts. (Delbecq, 1975, p. 84)

Other writers, from the field of marketing research, succinctly described the Delphi process as "(1)having the participants make separate forecasts.....(2)returning the forecasts to the analyst.....(3)returning the combined forecast to the forecasters.....(4)who make a new round of forecasts with this information. This process is continued until is appears that further rounds will not result in an added degree of consensus." (Tull and Hawkins, 1984, p. 563)

Although the Delphi is a relatively simple concept and process, there is one divergence which deserves attention. Two writers, in the same year -- 1975 -- differed on what should be the end result of the Delphi process. Like Hull and Hawkins, Sackman claimed....."The end product is the consensus of experts, including their commentary, on each of the questionnaire items, usually organized as a written report by the Delphi investigator." (Sackman, 1975, p. xi) Delbecq, while agreeing that consensus may be desirable in some instances, wrote: "Delphi is a tool to aid understanding and decision making." (Delbecq, 1975, p. 85) Delbecq's interpretation is the one being implemented in this research for action project.

Another Delbecq opinion receiving acceptance in this project is....."Delphi will be an effective process only if those decision makers who will ultimately act upon the results of the Delphi are actively engaged throughout the process."(Delbecq, 1975, p. 85) Delbecq's point of view has received support from other marketing researchers:

> The greatest benefit of the Delphi may be obtained from the process itself, which involves key managers in creative, future-oriented assessments, a type of task that is too often ignored due to other pressures.....The process of conducting the Delphi would itself be enligthening, contributing to a better

> understanding of the forces at work. This could, in fact, be the most significant outcome, given the difficulty of the task. (Cravens, 1980, pp. 85-86)

The major reason for selecting the Delphi as a research tool in this project is that it is compatible with the project's research for action emphasis. The members of the Panel of National Association Executives are considered to be the "managers" and "decision makers" visualized by Cravens and Delbecq.

The decision to include the Delphi in this research for action project was made after considering its disadvantages and weakness as pointed out by several writers found in the literature search. Probably the most critical writer has been Sackman who, like Dalkey (considered by many to be one of the originators of the Delphi), were employed by Rand. Sackman's entire book consists of a critical evaluation of the Delphi. He concluded his critique with the following summary evaluation and recommendation:

> The evidence adduced in this [Sackman] study clearly indicates that the massive liabilities of Delphi, in principle and in practice, outweigh its highly doubtful assets.....It is recommended that conventional Delphi be dropped from institutional, corporate, and government use until its principles, methods, and fundamental applications be experimentally established as scientifically tenable. (Sackman, 1975, p. 74)

The literature search made clear that the Delphi is still undergoing constant evaluation as a research tool. It also made clear that, especially in later years, the Delphi has been included in an increasing number of research projects. Inherent in many of those research projects is the premise that the Delphi can be helpful particularly if it is used in conjunction with other research tools. That is the situation in the current project. The literature search, the Delphi, and the on-site interviews comprise the toolbox for this project. Also, the "modified" Delphi approach avoids undue reliance on the use of questionnaires and puts a greater priority on understanding and clarification than on attaining a consensus among the members of the panel, the advisory group, and the questionnaire and interview respondents.

In his book, Dalkey constantly reiterated his belief that the Delphi is a particularly useful method for improving the quality of life (Dalkey, 1972). Assuming that he is correct, the Delphi is unusually compatible with the main thrust of this research project: to involve decisions makers in evaluating and possibly improving the quality of the

credentialing control system -- principally accreditation and certification -- in continuing occupational and professional education. More specifically, the Delphi process (both questionnaires and on-site interviews) will be instrumental in developing the models of excellence in accreditation and certification.

It is anticipated that the modified Delphi being used in this research for action project will be based upon the following procedures and assumed advantages:

1. Free sharing of information, perceptions, and opinions among the participants. The anonymity of responses should promote uninhibited participation.

2. Feedback to the participants will provide opportunity to modify their initial responses with a minimum of peer pressure due to the anonymity of their responses.

3. The second round of free sharing of information, perceptions, and opinions should ensure uninhibited participation because of the anonymity of the responses.

4. The second feedback to the participants will be based upon their modified or reiterated responses.

5. No further collection and compilation of information, perceptions, and opinions unless there is a consensus among the participants for another opportunity to provide additional information and additional modification of perceptions and opinions.

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Exhibit C

SCHEDULE OF ACTIVITIES

For

THE PROPOSED PROJECT

Contents:

Page	
107	1.0 Planning the Project
108	2.0 Implementing the Project
115	3.0 Evaluating the Project
116	4.0 Disseminating Information About the Project

1.0 PLANNING THE PROJECT

1.1 Project Coordinator (PC) selects "umbrella" organizations for national associations, accrediting bodies, and certifying organizations.

1.1.1 PC meets individually with representatives of the selected umbrella organizations.

1.1.2 PC creates Panel of National Association Executives for involvement in the project.

1.1.3 PC establishes system of numbered memorandums for intra-panel communication and with the Center on Education and Training for Employment (National Academy). The Center to appoint a staff member to serve as Project Liaison (PL) between the Center and the panel.

1.2 PC prepares first draft of the proposed research for action project.

1.2.1 PC discusses working draft of the proposal with the PL and prepares a revised draft.

1.2.2 PC distributes copies of the first revised draft among the panel members and PL with cut-off date for responses.

1.2.3 PC distributes second revised draft among the panel members and PL with cut-off date for responses.

1.2.4 PC distributes third working draft of the proposed project among the panel members and PL.

1.2.5 PC arranges for orientation meeting of the panel and the PL to include (1) a review and possible modification of the third working draft, (2) a review and possible modification of the Schedule of Activities, and 3) a discussion of the role of an advisory group to the panel. The panel members will be invited to provide the PC with "in-house" publications pertaining to the project.

2.0 IMPLEMENTING THE PROJECT

2.1 PC recommends to the panel and the PL, via a numbered memorandum, the creation of a national advisory group to work with the panel.

2.1.1 In that memorandum, PC suggests names of national organizations for the advisory group with a cut-off date for responses.

2.1.2 PC to prepare a revised list of names of national organizations for the advisory group from the feedback from the panel and PL and distribute copies of the revision to the panel and the PL with a cut-off date for responses.

2.1.3 PC to send letters of invitation to the consensus of names emerging from the second round of panel suggestions.

2.1.4 PC to allow three weeks for responses and then telephone the non-respondents.

2.1.5 PC sends letters of welcome to all affirmative respondents. Includes the list of acceptances and invites the advisory group members to suggest and/or provide the PC with "in-house" publications pertaining to the project.

2.1.5.1 Copies of the list of acceptances also to be sent to the panel members and PL by the PC.

2.2 PC will prepare working a draft of the proposed model of excellence in accreditation.

2.2.1 PC to mail copies of the working draft to the national panel members for their review and probable modifications accompanied by a suggested cut-off date for their responses.

2.2.2 Upon receipt of the responses, PC will prepare a revised working draft that will be mailed to the panel members and PL preparatory to a meeting of the panel members, the PC, and the PL for the purpose of writing a third draft of the model of excellence.

2.2.2.1 Copies of the third draft will be mailed to the members of the advisory group for their review and possible suggestions. Their responses are to be received by a suggested cut-off date.

2.2.2.2 Upon receipt of those responses, PC will prepare a fourth draft of the model to be mailed to the panel members and PL prior to a meeting with them for the

writing of the fifth and final draft that will be used in the questionnaire surveys.

2.2.2.3 Copies of the final draft will be mailed to the panel and advisory group members and PL before undertaking the questionnaire surveys.

2.3 Implementing the questionnaire surveys.

2.3.1 Preliminary selection of respondents for the questionnaires to:

A. National associations
B. Accrediting bodies
C. Continuing education organizations offering nondegree program accreditation not recognized by the Council on Postsecondary Accreditation (COPA).

2.3.2 National panel, PC, and PL meet to discuss the guidelines for the selection of questionnaire respondents in the stratified sampling to be employed in the study.

2.3.3 Immediately following the panel meeting, PC will meet with each panel member (or designate) to finalize the guidelines for his/her organization and to make preliminary selection of the respondents.

2.3.4 Immediately following the individual meetings with the panel members PC will prepare a numbered memorandum containing the results of the meetings.

2.3.5 Panel members will respond to that memorandum by an agreed-upon cut-off date.

2.3.6 The PC and the PL will prepare a preliminary draft of the questionnaires and then PC will meet individually with each panel member (or designate) to prepare a revised working draft for his/her organization.

2.3.7 Immediately following those three meetings, PC will prepare a numbered memorandum containing the results of the meetings and send copies to the panel members.

2.3.8 The panel members will respond to that memorandum by an agreed-upon cut-off date.

2.3.9 PC will prepare another draft of each questionnaire and send it to the appropriate panel member with a request for response by a cut-off date. Each panel member also will be requested to suggest names of prospective respondents for field testing the questionnaire.

2.3.10 PC and PL will meet to review the questionnaires and to prepare for field testing them.

2.3.11 PC will conduct the field testing of the questionnaires. Copies of each questionnaire to be sent to all panel and advisory group members with requests for response to be given to the PC by the same cut-off date used for the questionnaire respondents.

2.3.12 Results of the field testing, including PC's interpretations of each questionnaire, will be sent to all panel/advisory group members and PL.

2.3.13 PC then will meet with each panel member (or designate) to prepare the final draft of the questionnaire for his/her organization's stratified sampling. Selection of the questionnaire respondents to be made at each meeting.

2.3.14 The next step is a meeting of the entire panel with PC and PL. Prior to that meeting, copies of all three questionnaires and selections of questionnaire respondents will be sent to all panel/advisory group members.

2.3.15 PC will conduct the questionnaire surveys.

2.3.15.1 Questionnaire respondents will be requested to return the completed questionnaires by a cut-off date. Respondents not replying by that date will be sent another copy of the questionnaire with another cut-off date. Respondents still not replying will be called by telephone and asked to return their completed questionnaires by the final cut-off date. All replies received by the telephone cut-off date will be included in the analysis of the results of the questionnaire surveys. (It is likely that each questionnaire survey will have its own series of cut-off dates.)

2.3.15.2 PC will prepare analyses of the results of the three questionnaire surveys and send copies of the results and analyses to the panel/advisory group members and PL. They will be requested to respond by suggested cut-off dates.

2.3.16 PC will meet with each panel member (or designate) individually to prepare a working draft of the report on the questionnaire survey for his/her organization.

2.3.17 The next step is a meeting of the entire panel with PC and PL. Prior to that meeting, copies of all three reports will be sent to each member for the

preparation of the first draft of the composite report on the questionnaire surveys.

2.3.17.1 The panel members and PL also will receive a list of suggested names for a team of three evaluators who will evaluate the final composite report. That list will be compiled by PC and PL who will be advised by the Product Review Exchange office of the Center on Education and Training for Employment (CETE). The panel will select the members of the evaluation team at this meeting.

2.3.18 PC will prepare the first draft of the composite report shortly after the panel meeting. Copies of that first draft will be sent to all panel members and PL. They will be invited to respond by a suggested cut-off date.

2.3.19 Copies of the second (and final) draft of the composite report prepared by PC will be sent to all panel and advisory group members, the evaluation team, PL, and CETE's Product Review Exchange (PRE).

2.4 Implementing the on-site interviews.

2.4.1 Preliminary selection of individuals for interviews who represent:

A. National associations
B. Accrediting bodies recognized by COPA
C. Accrediting bodies, not recognized by COPA, that accredit organizations offering nondegree continuing education programs

2.4.2 Panel will meet with PC and PL to discuss the guidelines for the selection of the interviewees in the stratified sampling to be employed in the study.

2.4.3 Following the panel meeting, PC and PL will meet with each panel member (or designate) to finalize the guidelines for his/her organization and to make preliminary selection of the interviewees.

2.4.4 Following the individual meetings with the panel members, PC will prepare a numbered memorandum containing the results of the meetings with individual panel members. A copy of the memorandum will go to each panel member and PL.

2.4.5 Panel members and PL will respond to that memorandum by an agreed-upon cut-off date.

2.4.6 PC and PL will prepare a structured interview model and then PC will meet individually with each panel member

(or designate) to prepare a structured interview guide for his/her organization and to make preliminary selection of interviewees for field testing that organization's interview guide.

2.4.7 Following the meetings with each of the panel members, PC will prepare a numbered memorandum that contains the results (three structured interview guides and interview selections for field testing the guides) of the meetings and send copies to all panel members and PL.

2.4.8 Panel members and PL will respond to that memorandum by an agreed-upon cut-off date. Their panel members' responses will consist of revisions of the structured interview guides for their organizations and their final selection of interviewees for the field testing.

2.4.8.1 PC and PL will review the revised structured interview guides and prepare for field testing them.

2.4.9 PC will conduct the field testing of the structured interview guides and then, together with PL, will meet with each panel member (or designate) to prepare the final version of the structured interview guide for his/her organization.

Also at each meeting, PC, PL, and the panel member will make the final selections of individuals to be interviewed.

2.4.10 PC will conduct twelve on-site interviews as follows:

Eight national trade and professional associations:
1 Trade association - provides accreditation and/or certification program
1 Trade association - provides certification program but no accreditation program
1 Trade association - no accreditation or certification program
1 Trade association - accredits or approves sponsors of CPE programs

1 Professional association - provides accreditation and/or certification program
1 Professional association - provides certification program but no accreditation program
1 Professional association - no accreditation or certification program
1 Professional association - accredits or approves sponsors of CPE programs

Four accrediting bodies (COPA-recognized and/or USDOE-approved):
1 National (institutional)
1 Regional (institutional)
2 Specialized (programmatic)

2.4.11 PC will prepare a working draft of the results of each interview as soon as possible following the interview.

2.4.11.1 The working draft of each interview will be submitted to the interviewee accompanied by a copy of that section of the questionnaire composite report pertaining to his/her's organization type (national association, COPA-recognized accrediting body, non-COPA-recognized accrediting body). A cut-off date will be specified for each interviewee's response.

2.4.12 Immediately upon receipt of each interviewee's response, PC will prepare a revised working draft of the interview report.

2.4.12.1 Each revised draft will be submitted to the appropriate panel member (or designate) with a suggested cut-off date for response.

2.4.13 Upon receipt of each interviewee's response, PC will prepare the second revised draft for distribution to all panel members and PL with a suggested cut-off date for response. Copies also will be sent to the advisory group members with the same suggested cut-off date.

2.4.14 After receiving all interviewee responses, PC will prepare the final draft of each interview report.

2.4.14.1 After all twelve interview reports have been completed, PC and PL will meet to prepare three summary reports; one for the trade and professional associations, one for the COPA-recognized accrediting bodies (including the specialized accrediting body that offers sponsor-approval services), and one for the non-COPA-recognized accrediting bodies.

2.4.14.2 Copies of the twelve interview reports and the three summary reports will be sent to the panel members, the three-member evaluation team, PL, and the CETE's Product Review Exchange (PRE). (See 3.1.1 on PRE.)

2.4.15 The next step is a meeting of the entire panel with PC and PL to begin the preparation of the composite report based on the twelve interview and three summary

reports.

2.4.16 PC will prepare the first draft of the composite report shortly after the panel meeting. Copies of that first draft will be sent to all panel members and PL who will be invited to respond by a suggested cut-off date. A copy also will be sent to the CETE's Production Review Exchange.

2.4.17 Copies of the second (and final) draft of the composite report, prepared by PC will be sent to all panel and advisory group members, the three-member evaluation team, PL, and CETE's Product Review Exchange. (See 3.1.1 on PRE.)

3.0 EVALUATING THE PROJECT

3.1 Evaluating the questionnaire surveys composite report.

3.1.1 As mentioned in .2.3.19, copies of the composite report will be sent to CETE's Product Review Exchange (PRE) that arranges for the review of working drafts of reports by internal (CETE) and external experts in the areas being investigated.

3.1.2 PRE will prepare an evaluation report based upon its internal and external experts' analyses of the questionnaire surveys composite report. Copies of the PRE report will go to the panel and advisory group members, PC, and PL.

3.1.3 A three-member evaluation team will be created by the panel to respond to the questionnaire surveys composite report. The team members will be selected at the panel meeting described in 2.3.17.

3.1.3.1 The team will prepare a written report. Copies will go to the panel and advisory group members, PRE office, PC, and PL.

3.1.4 The panel will meet to discuss the PRE and evaluation team reports. This discussion will precede the panel's deliberation of guidelines for the selection of interviewees described in 2.4.2.

3.2 Evaluating the on-site interviews.

3.2.1 The three-member evaluation team will prepare a written report on its analysis of PC's composite report (based upon his final reports of the on-site interviews). Copies will go to the panel and advisory group members, PRE office, PC,and PL.

3.2.2 PRE will prepare a written report on its analysis of the same PC's composite report. Copies will go to the panel and advisory group members, PC, and PL.

3.2.3 The panel, PC, and PL will meet to discuss the two reports.

4.0 DISSEMINATING INFORMATION ABOUT THE PROJECT

4.1 Disseminating information during the project.

4.1.1 Members of the panel and the advisory group may want to release information through their in-house publications about their participation in the project.

4.1.2 The funding agency may want to release information through its in-house publications about its participation in the project.

4.1.3 The Center for Education and Training for Employment may want to release information through its in-house publications about its participation in the project.

4.1.4 Throughout this project, PC will prepare progress reports that can provide background information for the above-mentioned information releases.

4.2 Disseminating information about the results of the study.

4.2.1 One official report will be prepared by PC for approval by the panel and PL before it is submitted to the advisory group members for their information.

4.2.1.1 A copy also will be submitted to ERIC.

4.2.1.2 All organizations participating in the study may want to release information about the report through their in-house publications and their organizational meetings.

4.2.2 If funding becomes available, a national conference, meeting in Washington, D.C., will be scheduled to encourage national organizations to become involved with improving the credentialing process of accreditation for the benefit of their individual and institutional members and the general public.

4.2.2.1 The conference meetings will be based upon the official report. Each conference participant will receive a copy of the official report and a summary of the conference proceedings.

Exhibit D

PROJECT GLOSSARY

Accreditation (Accrediting)
Systematic process by voluntary, nongovernmental entities such as educational agencies, trade and professional associations, and corporations to: (1) strengthen the evaluation procedures of institutions or programs offering postsecondary education in order to improve those educational offerings and (2) provide public recognition for meeting or exceeding commonly accepted standards of educational quality.

Accrediting Body (Agency)
A legal entity such as an association, commission, council, or corporation -- or part of that entity -- that engages in accrediting activities.

Adult (Continuing) Education
Adult education is organized effort made by society through a variety of its institutions to provide opportunities for adults to learn what they choose, when they choose, during their life span. Those learning opportunities usually do not include academic for certificates or degrees.

Association (Society)
A trade association is a not-for-profit voluntary membership organization of business competitors (usually companies). A professional association (society) is a not-for-profit organization comprised of individuals with a common background in a subject or a profession such as accounting, law, or medicine.

Certification
Systematic process by a governmental or nongovernmental entity to provide public recognition and grant the right to use a title restricted to those practitioners who voluntarily have met the standards of the certifying body. Noncertified persons may legally engage in a certified occupation or profession but cannot publicly proclaim themselves to be "certified."

Certifying Body - Nongovernmental
One model is a free-standing organization that is not part of any other organization such as a trade or professional association. A second model is an organization that is affiliated with or is a component of a trade or professional association.

Continuing Occupational/Professional Education
Legally authorized postsecondary educational programs designed to improve the competencies of practitioners in

their occupations and professions. Successful completion credentials may be awarded but usually do not include academic or professional credits or degrees.

Occupational educational/training programs emphasize career development and often prepare their graduates for licensure or relicensure in one or more states.

Professional educational/training programs often enable their graduates to obtain relicensure in one or more states and to improve their everyday performance in their chosen professions.

Credentialing

A process that includes (1) definition of competencies to be verified, (2) assessment of each applicant to determine whether he or she has attained the required competencies, and (3) issuance of a document to attest the applicant's possession of the required competencies. Typical documentation includes accreditation, certification, or licensure.

Educational and Training Programs

Legally authorized structured instructional or study activities often in the form of courses that may -- but usually do not -- include academic credits and degrees.

Licensure

Systematic process by a governmental agency to grant permission to (1) persons possessing the required competencies to engage in a given occupation or profession and to use a particular title, and (2) institutions to perform specified functions.

Participants

Persons enrolled in legally authorized education and training programs who have demonstrated their ability to benefit from the educational and/or training programs offered.

Practitioners

Persons who are qualified to engage in the daily practice of an occupation or profession.

Providers

Persons, programs, and institutions (including trade and professional associations) that are directly involved in planning, implementing, and evaluating CPE programs.

Sponsors

Persons, programs, and institutions (including trade and professional associations) that approve and may affiliate with CPE providers.